



Deposition of:
Cager Maleeah

May 6, 2019

In the Matter of:
Maleeah, Cager A. Vs. PA Darcy

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

CAGER A. MALEEAH, GDOC#)
1001208951,)
)
Plaintiff,)
)
) CIVIL ACTION NO.
vs.) 4:18-CV-96-WTM-
) JEG
)
)
PA DARCY, JUANITA GREENE, HELEN)
TYLER, TONY ANDERSON, HANNAH)
DORSEY, DEBORAH IVEY TERRY and)
DR. DELINDA BROWN,)
)
Defendants.)
_____)

Deposition of CAGER A. MALEEAH, taken by
counsel for the Defendants, PAUL JAY PONTRELLI,
pursuant to notice and by agreement of counsel, under
the Georgia Civil Practice Act, reported by Elise M.
Napier, CCR-2492, in the offices of Coastal State
Prison, 20 Gulfstream Road, Garden City, Georgia, on
Monday, May 6, 2019, commencing at 11:07 a.m.

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<p>1 APPEARANCES OF COUNSEL</p> <p>2</p> <p>3 FOR THE PLAINTIFF:</p> <p>4 CAGER A. MALEEAAH, Pro Se</p> <p>5 GDOC# 1001208951</p> <p>6 Coastal State Prison</p> <p>7 20 Gulfstream Road</p> <p>8 Garden City, Georgia 31418</p> <p>9 (912) 966-6799</p> <p>10</p> <p>11 FOR PA DARCY, JUANITA GREENE, HELEN TYLER, TONY</p> <p>12 ANDERSON, HANNAH DORSEY, DEBORAH IVEY TERRY and:</p> <p>13</p> <p>14 PAUL JAY PONTRELLI, Esquire</p> <p>15 DEPARTMENT OF LAW, STATE OF GEORGIA</p> <p>16 40 Capitol Square, S.W.</p> <p>17 Atlanta, Georgia 30334</p> <p>18 (404) 657-3982</p> <p>19 ppontrelli@law.ga.gov</p> <p>20</p> <p>21 FOR DR. DELINDA BROWN:</p> <p>22</p> <p>23 B. NICOLE SMITH, Esquire</p> <p>24 HUFF POWELL BAILEY, LLC</p> <p>25 999 Peachtree Street, N.E.</p> <p>Suite 950</p> <p>Atlanta, Georgia 30308</p> <p>(404) 892-4022</p> <p>nsmith@huffpowellbailey.com</p>	<p>1 Evidence</p> <p>2 Exhibit 5 Plaintiff's Motion to Amend His 80</p> <p>Complaint and Add Specific Medical</p> <p>3 Records as Exhibits For Evidence</p> <p>4 and to Have Exhibits 1 through 36</p> <p>Included In Original Complaint</p> <p>5 Recognized by This Court As Evidence</p> <p>6 Exhibit 6 Motion to Modify Court and Counsel 85</p> <p>for Defendants as to Coastal State</p> <p>7 Prison Medical Staff Claiming to</p> <p>Have Lost Medical Records and</p> <p>8 Doctors Order to Change Meds</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 I N D E X</p> <p>2</p> <p>3 Stipulation Page 5</p> <p>4 EXAMINATION</p> <p>5 By Mr. Pontrelli 6</p> <p>6 By Ms. Smith 97</p> <p>7 By Mr. Pontrelli 120</p> <p>8 By Ms. Smith 124</p> <p>9 Signature of Deponent 128</p> <p>10 Certificate of Reporter 129</p> <p>11 Reporter Disclosure 130</p> <p>12 Contractor Disclosure 131</p> <p>13 (Reporter's disclosure statement attached</p> <p>14 to back of transcript.)</p> <p>15</p> <p>16 * * * * *</p> <p>17</p> <p>18 E X H I B I T S</p> <p>19</p> <p>20 Defendant's</p> <p>21 Exhibit Description Page</p> <p>22 Exhibit 1 Amended Notice of Deposition 5</p> <p>23 Exhibit 2 Georgia Department of Corrections 37</p> <p>Physicians Orders - Medical Records</p> <p>24 Exhibit 3 Complaint dated 4/27/2018 63</p> <p>25 Exhibit 4 Plaintiff's Motion to Amend 75</p> <p>Complaint and Add a New Defendant</p> <p>Chief Counselor and Grievance Card,</p> <p>Ms. Rivers, and to Add Additional</p> <p>Exhibits to Be Entered In As</p>	<p>1 MR. PONTRELLI: This will be the</p> <p>2 deposition of, is it Cager or Care?</p> <p>3 MR. MALEEAAH: Cager.</p> <p>4 MR. PONTRELLI: Cager Maleeah?</p> <p>5 MR. MALEEAAH: Yes, sir.</p> <p>6 MR. PONTRELLI: Taken pursuant to an</p> <p>7 amended notice of deposition, which will be marked</p> <p>8 as Defendant's Exhibit 1.</p> <p>9 (Thereupon, marked for identification</p> <p>10 was Defendant's Exhibit 1.)</p> <p>11 MR. PONTRELLI: But to be clear, for the</p> <p>12 record I'm Jay Pontrelli from the Georgia Attorney</p> <p>13 General's Office and I represent Juanita Greene,</p> <p>14 Helen Tyler, Tony Anderson, Hannah Dorsey, Deborah</p> <p>15 Ivey Terry. They are the named defendants who I</p> <p>16 represent and then there is an additional</p> <p>17 defendant, to my understanding, who has not been</p> <p>18 added yet or has been added by court order but has</p> <p>19 not waived service or been served yet, Ms. Cynthia</p> <p>20 Rivers, so I represent those six individuals.</p> <p>21 And I'll let Ms. Smith say who she</p> <p>22 represents when I finish this little intro. So</p> <p>23 this will be taken pursuant to the Federal Rules</p> <p>24 of Civil Procedure for all purposes allowed under</p> <p>25 the Federal Rules of Civil Procedure. Would you</p>

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<p style="text-align: right;">Page 6</p> <p>1 like to for the record state who you represent?</p> <p>2 MS. SMITH: My name is Nikki Smith, I</p> <p>3 represent Dr. DeLinda Brown in this action that</p> <p>4 you have filed against her. My law firm is Huff,</p> <p>5 Powell, Bailey.</p> <p>6 MR. PONTRELLI: Would you please swear</p> <p>7 in the witness.</p> <p>8 CAGER A. MALEEAH,</p> <p>9 being first duly sworn, testified as follows:</p> <p>10 EXAMINATION</p> <p>11 BY MR PONTRELLI:</p> <p>12 Q. Okay. Good morning, Mr. Maleeah.</p> <p>13 A. Good morning.</p> <p>14 Q. I'm Jay Pontrelli.</p> <p>15 A. Nice to meet you.</p> <p>16 Q. Nice to meet you. I'm going to be</p> <p>17 asking you a series of questions about the case and</p> <p>18 try not to move around so much because it's making a</p> <p>19 lot of noise when I do.</p> <p>20 A. Mr. Pontrelli, can I say something real</p> <p>21 quick about the order identifying the defendants?</p> <p>22 There was an order put in shortly after the complaint</p> <p>23 where a defendant, Ms. Terry was actually replaced</p> <p>24 with a name of Ms. Grant.</p> <p>25 Q. Yes. I was going to get to that.</p>	<p style="text-align: right;">Page 8</p> <p>1 times when we ask them to do certain things or</p> <p>2 anything really for us, they tell us what we need to</p> <p>3 hear to get moving on so it's hard to get any</p> <p>4 confirmation from them. I was told that I was put</p> <p>5 in a pending transfer by my counselor, Ms. Holmes,</p> <p>6 but then I had another counselor that checked and</p> <p>7 said that I wasn't put in at all.</p> <p>8 Q. So what is your maximum release date?</p> <p>9 A. January of 2023.</p> <p>10 Q. Okay. Well, if you do get moved,</p> <p>11 probably you already know this, but please send a</p> <p>12 notice to the court --</p> <p>13 A. All right.</p> <p>14 Q. -- with your new address because even</p> <p>15 though I work for the state, don't assume that I</p> <p>16 would know that if I hadn't heard it from you.</p> <p>17 A. I got you. Yes, sir.</p> <p>18 Q. All right. As far as Ms. Grant goes,</p> <p>19 I'm not giving you any legal advice here --</p> <p>20 A. I understand.</p> <p>21 Q. -- I'm just explaining to you how it</p> <p>22 stands. You named Juanita Greene, Helen Tyler, Tony</p> <p>23 Anderson, Hannah Dorsey and Deborah Ivey Terry, then</p> <p>24 you filed something saying that you had made a</p> <p>25 mistake and that Ms. Terry was named Ms. Grant?</p>
<p style="text-align: right;">Page 7</p> <p>1 A. Okay.</p> <p>2 Q. And so you've been sworn in; right?</p> <p>3 State your name for the record.</p> <p>4 A. Cager A. Maleeah.</p> <p>5 Q. Okay. And, Mr. Maleeah, what's your</p> <p>6 Georgia Department of Corrections number?</p> <p>7 A. 1001208951.</p> <p>8 Q. And what were you convicted of?</p> <p>9 A. Child molestation.</p> <p>10 Q. And when are you -- when is your term</p> <p>11 or when are you eligible for parole?</p> <p>12 A. I'm eligible now for TC.</p> <p>13 Q. Okay.</p> <p>14 A. I'm supposed to be in pending transfer</p> <p>15 to a TC now.</p> <p>16 Q. That's a transitional --</p> <p>17 A. Transitional center, like a halfway</p> <p>18 house.</p> <p>19 Q. So what are you waiting on for that?</p> <p>20 A. To be confirmed that I'm pending. I've</p> <p>21 had -- I had a little bit of, I don't know the right</p> <p>22 word to use for it, kind of a reluctance from the</p> <p>23 counselor's. We have a difficult time getting our</p> <p>24 counselor's to perform some duties for us. And it's</p> <p>25 not just me, it's the overall consensus is a lot of</p>	<p style="text-align: right;">Page 9</p> <p>1 A. Yes.</p> <p>2 Q. That's not a substitution of parties</p> <p>3 that's a change of name. There, in fact, is a</p> <p>4 Deborah Ivey Terry and so she answered in this case</p> <p>5 and is still there. If you were wanting to get a</p> <p>6 Ms. Grant in this case, you would have to make</p> <p>7 arrangements to serve her. I will tell you that I</p> <p>8 did a little looking into this and apparently there</p> <p>9 was a Brinder Grant, a nurse, B-r-i-n-d-e-r. She was</p> <p>10 not hired until June 5th, 2016 so, again, I'm not</p> <p>11 giving you legal advice I'm just explaining to you</p> <p>12 there is no Ms. Grant in this case.</p> <p>13 A. I'll do some more research on it.</p> <p>14 Q. Okay. The Court would have had to</p> <p>15 order an substitution. All he did was say that you</p> <p>16 made a mistake and Terry should have been Grant but</p> <p>17 there actually is an Ivey Terry. I met with her and</p> <p>18 so she answered.</p> <p>19 A. All right.</p> <p>20 Q. Does that make sense?</p> <p>21 A. Yeah. Yes, sir.</p> <p>22 Q. And, again, there is no record of a</p> <p>23 Grant that was even there during May 22, 2016 to May</p> <p>24 26, 2016. Okay. So I see that you filed or filed</p> <p>25 and sent me something you referred to as a deposition</p>

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<p style="text-align: right;">Page 10</p> <p>1 upon written questions.</p> <p>2 A. Yes, sir.</p> <p>3 Q. Again, you sent questions to</p> <p>4 Ms. Rivers. Her answer are not due yet because she</p> <p>5 hasn't even filed an answer in the case. Ms. Darcy,</p> <p>6 I represent her and we will send you responses to</p> <p>7 your questions.</p> <p>8 A. All right.</p> <p>9 Q. Ms. Grant, now, you will not receive</p> <p>10 any responses from her because she's not in this</p> <p>11 case. If you go back and do your research and you</p> <p>12 decide that you want those questions to apply to</p> <p>13 Ms. Ivey Terry, you let me know in writing and we'll</p> <p>14 handle it?</p> <p>15 A. All right.</p> <p>16 Q. Ms. Tyler, you will receive responses</p> <p>17 from Ms. Tyler and Ms. Green, you will receive</p> <p>18 responses from Ms. Green and Nurse Anderson you will</p> <p>19 receive responses from her. So we're going to first</p> <p>20 before we go through any records and everything, I'd</p> <p>21 like to start by having you walk me through</p> <p>22 everything to the best of your recollection and then</p> <p>23 we'll go through some specifics in your complaint and</p> <p>24 some of the medical records.</p> <p>25 I will represent to you that you have</p>	<p style="text-align: right;">Page 12</p> <p>1 bit and felt like it was burning a little bit so I</p> <p>2 put on my boot and went ahead and laced it up, went</p> <p>3 to work and after a couple of hours it was just</p> <p>4 bothering me to where I couldn't stand on it anymore</p> <p>5 so I went sat down and the detail officer, his name</p> <p>6 is Mr. Smith, came up and asked me what was wrong</p> <p>7 with my foot.</p> <p>8 He started messing with my boot and so</p> <p>9 my foot started hurting so he asked me to take my</p> <p>10 boot off so he could take a look so I took my boot</p> <p>11 off and we both immediately were just right then and</p> <p>12 there knew something was wrong because my foot was</p> <p>13 bright fire engine red. I mean, it was really red I</p> <p>14 couldn't -- like it was like it was dipped in hot</p> <p>15 water, I mean, acid and it was burning and stinging</p> <p>16 so --</p> <p>17 Q. Could I stop you there for a second?</p> <p>18 A. Yep.</p> <p>19 Q. When you say your foot was bright red,</p> <p>20 would you say your entire left foot was bright red?</p> <p>21 A. Yes.</p> <p>22 Q. Was any part of the foot, say, like</p> <p>23 near the toe that had been surgically removed, was</p> <p>24 that part brighter or a different color?</p> <p>25 A. No. All the same color, bright red the</p>
<p style="text-align: right;">Page 11</p> <p>1 received copies of every medical record that I've</p> <p>2 received. Some were received from the prison and</p> <p>3 some were received from Memorial Hospital. I just</p> <p>4 went and copied them and sent them to you.</p> <p>5 A. I appreciate that. Thank you.</p> <p>6 Q. All right. Your complaint indicates</p> <p>7 that your feet, your foot problem is left foot?</p> <p>8 A. Uh-huh.</p> <p>9 Q. Okay. It began on May 22nd, 2016?</p> <p>10 A. Uh-huh.</p> <p>11 Q. You'll have to say yes or no.</p> <p>12 A. I'm sorry, yes, I did.</p> <p>13 Q. Okay. So tell me about when you first</p> <p>14 noticed --</p> <p>15 A. It's when I woke up --</p> <p>16 Q. -- when there was a problem and walk me</p> <p>17 through it.</p> <p>18 A. All right. It's when I work up that</p> <p>19 morning to go to work in the kitchen.</p> <p>20 Q. What time?</p> <p>21 A. About 12:45, 1:00 in there because I</p> <p>22 work first shift for breakfast and when I woke up,</p> <p>23 the room was dark so I didn't turn the light on so I</p> <p>24 obviously couldn't see my foot was red. I didn't</p> <p>25 know what was wrong with it but it tingled a little</p>	<p style="text-align: right;">Page 13</p> <p>1 whole foot.</p> <p>2 Q. Okay. Same color throughout the foot.</p> <p>3 Did it go up the ankle at all?</p> <p>4 A. Right to the ankle.</p> <p>5 Q. Okay.</p> <p>6 A. Right to the ankle.</p> <p>7 Q. Please continue.</p> <p>8 A. All right. So he suggested that we go</p> <p>9 to medical and let them take a look so we walked up</p> <p>10 there and it's bothering me to talk on it now. So we</p> <p>11 get up to medical and Ms. Tyler was on duty and she</p> <p>12 didn't even bother getting up from the desk. She was</p> <p>13 like it's too late for us to be able to do anything.</p> <p>14 You need -- you know, we need to have an appointment</p> <p>15 for you to see a doctor or a PA Monday morning so</p> <p>16 there is nothing we can do for you.</p> <p>17 Q. Okay.</p> <p>18 A. So she sent me back to the dorm.</p> <p>19 Q. So this is at --</p> <p>20 A. About 3:00.</p> <p>21 Q. It's in the early morning of May 22nd,</p> <p>22 2016?</p> <p>23 A. Yeah.</p> <p>24 Q. So Sunday has just begun?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 14</p> <p>1 Q. And she told you there is no PAs or 2 higher for medical doctors available until Monday 3 morning? 4 A. Right. 5 Q. Okay. 6 A. And didn't even ask to look at my foot, 7 didn't even look at it. 8 Q. How do you know it was Nurse Tyler that 9 you saw? 10 A. Because I knew her. 11 Q. Oh, you know her. Could you describe 12 what she looks like? 13 A. Young, light skinned, short hair, kind 14 of tall, about six-two, six-one, right in there. She 15 wears her hair short, cropped. 16 Q. Do you know how old? 17 A. Maybe 50s, maybe late 50s. 18 Q. And how did you know who she was as of 19 May 22nd, 2016? 20 A. Just from being in medical and it 21 doesn't take long to get to know who people are here. 22 Q. Okay. All right. So I'm not putting 23 words in your mouth so just I think where you left me 24 off is that she said she couldn't do anything for you 25 until Monday morning and she didn't even look at your</p>	<p style="text-align: right;">Page 16</p> <p>1 A. Yeah. Because the sock wouldn't even go 2 over it without it causing me pain so -- 3 Q. Is it your testimony that up until the 4 morning of the 23rd you had not received any pain 5 medication? 6 A. Nothing. 7 Q. Okay. And no other kind of medication 8 for -- 9 A. I got nothing. I mean, I couldn't 10 believe it. They kept sending me back to dorm. I 11 went back to medical that night on the 22nd. I went 12 back because the officer that was on duty saw that my 13 foot was bad. I went up and said, man, my foot is 14 killing me. It's driving me crazy and the aspirin 15 they give us in the module wasn't touching it and I 16 had been taking it as much as they would give me out 17 of the window.] 18 And so that evening she sent me back to 19 medical so that the nurses could see how bad my foot 20 was getting. And when I get down there, they spin me 21 right back around, sent me back to the dorm pissed 22 off because I didn't have a call out slip, one, and, 23 two, said there wasn't anything they could do until 24 the next day when the physicians and the doctors were 25 there.</p>
<p style="text-align: right;">Page 15</p> <p>1 foot. All right. Please continue. 2 A. So I went back to the dorm and all that 3 day my foot started to swell and it was a little 4 swollen when I woke up because when I shoved my boot 5 in my boot it was tight but I thought it was just my 6 boot was laced so tight. But later that day it got 7 to the point where I couldn't put my boot on at all. 8 It was swollen significantly more since I had left 9 work and went back to the dorm. 10 So something happened to the foot that 11 over time it continually got bigger and bigger and 12 changed color and didn't stop. I mean, it was 13 growing by the hour and to the point of it looked 14 like the skin would split. It was crazy. Then it 15 started changing color from red to purple. 16 Q. And this was on during the 22nd? 17 A. All day the 22nd, the evening of the 18 22nd and then on the 23rd, the morning I went to 19 medical to see the physician, it was so swollen I 20 couldn't put my boot on at all, couldn't put my boot 21 on at all. 22 Q. So what did you wear on your left foot 23 when you went to medical? 24 A. A shower shoe. 25 Q. Okay.</p>	<p style="text-align: right;">Page 17</p> <p>1 I mean, I couldn't understand why they 2 couldn't deal with the pain part of it because my 3 pain was -- my foot was on fire. It was literally on 4 fire. If you could have seen what my foot looked 5 like right at that point, it would blow your mind. 6 The deputy warden saw my foot in passing one day when 7 I'm sitting in medical with my foot upon the bench 8 stopped him in his tracks. 9 Q. Well, why don't you describe for me 10 what it did look like the evening of the 22nd when 11 they sent you back. 12 A. It was extremely swollen, grotesquely 13 swollen. I mean, it looked like it would pop, it 14 looked like it would split open, purple and red and 15 my leg was starting to swell up up here. The calf 16 coming up to my knee was starting to get fat. 17 Q. Let the record reflect that the witness 18 gestured with his hands from his ankle up to his 19 knee, the bottom of his knee. And you're indicating 20 to me that there was swelling all the way up to the 21 knee? 22 A. Yeah. It was starting to get swollen. 23 Yes. 24 Q. Was it -- 25 A. Up here.</p>

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<p style="text-align: right;">Page 18</p> <p>1 Q. Was it as severe as the swelling in 2 your feet? 3 A. No. 4 Q. And was there any discoloration in your 5 leg? 6 A. Not like the foot, not red and purple. 7 That didn't start until a few days later and they 8 were in the form of it was a little red coming up my 9 calf but it was pink streaks coming up my leg from my 10 foot and each day they got a little higher. 11 Q. So it's your testimony that on the 12 evening of May 22nd, 2016, you had pink strips? 13 A. No. That didn't start until a couple 14 days later. 15 Q. All right. We'll get to that then. 16 A. All right. 17 Q. So what happened on the -- assuming I 18 haven't cut you off in the chronology of anything 19 significant, what happened IN the 23rd? And you can 20 go back to the 22nd unless there is something I need 21 to know. 22 A. Okay. So on the 23rd on that morning I 23 went down to see the doctor at first session, so we 24 go check in with an officer at the desk and then 25 sitting in a room until we're called on. So I sat</p>	<p style="text-align: right;">Page 20</p> <p>1 that she ordered the foot cream, the Motrin and the 2 antibiotics for my foot and that was pretty much the 3 end of it. She did no tests, no examination, never 4 touched my foot and then she made comments in some of 5 the medical notes that she touched my foot. She 6 never ever touched my foot not one time. She never 7 even got down to look at it. 8 So, anyway, I went back to the dorm. 9 She gave me nothing for the pain. I went back in the 10 dorm with my foot on fire and later that night, I 11 think it was that night, I have to look at my notes, 12 but I believe I went back to medical that night or 13 the next morning I know that I went because I had to 14 go to pill call. 15 Oh, that's what it was. I went to pill 16 call that night. She told me that my medications 17 were going to be waiting at pill call that night and 18 I already been here long enough to know that if they 19 don't ever fill prescriptions on the same day, and so 20 I asked her if I could get somewhere right then and 21 there for my foot and she said we don't have 22 medications available like that so, no. You can't. 23 We don't have it. 24 But it will be a pill call window and I 25 knew they weren't going to be there because my</p>
<p style="text-align: right;">Page 19</p> <p>1 there for about three hours before finally getting 2 called out to see a physician's assistant named 3 Ms. Darcy. And, anyway, I go into her office and she 4 barely even looks at my foot. I mean, I couldn't 5 believe she just glances like this, didn't even bend 6 down to get close to it and see and she's sitting at 7 her desk writing on my file and she goes it looks 8 like it's athletes foot and it's gotten infected. 9 And I about fell off the chair, I 10 couldn't believe it. I'm like athletes foot? I know 11 what athletes foot looks like. I'm 55 years old, you 12 know what I mean? I've always taken good care of my 13 feet and it didn't look anything athletes foot. I 14 was shocked but she said she was going to order me 15 some antibiotics, some foot cream and Motrin for the 16 pain. 17 So when I heard the word antibiotics, I 18 knew that my foot was infected. I knew that because 19 of the swelling and I was glad to hear she was 20 getting me some antibiotic but I asked her if Dr. Awe 21 could look at it to get an -- 22 Q. A-w-e. 23 A. He's the medical director/physician. 24 He's the actual physician, so she got angry with me 25 for even asking that question, said he was busy and</p>	<p style="text-align: right;">Page 21</p> <p>1 medication comes from Reidsville; all right? So, 2 anyway, I go back to the dorm and that night at pill 3 call when they call pill call, you do pill call, I go 4 down there to the window and they tell me that there 5 is no medication for me, which I knew they would tell 6 me that. And I told her what was happening, the 7 nurse in the window, what was going on with my foot 8 and that Ms. Darcy said that the medication would be 9 there waiting for me and it wasn't, so and that my 10 foot was extremely painful. 11 She tells me that I can if I want go 12 back to the nurse's station and see if they can help 13 me out. So I go back there and my foot is killing 14 me. I get back there and I try to explain to them 15 what I'm even back there for and they instantly go 16 off on me about why I'm even back there at the 17 nurse's station not even concerned about my foot. 18 Q. This is the evening of the 23rd? 19 A. Yes. 20 Q. Who, do you recall who was there, you 21 claim was at the nursing station that night? 22 A. I'll have to check my notes, my notes to 23 be accurate but I think it was Ms. Grant and 24 Ms. Tyler. 25 Q. Okay.</p>

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<p style="text-align: right;">Page 22</p> <p>1 A. But, like I said, I would have to check 2 my notes to confirm that part, but they basically 3 said that I had to wait for the medications to arrive 4 from Reidsville and sent me back to the dorm. So I'm 5 still now at this point with nothing for pain for my 6 foot, nothing. 7 Q. Are you familiar with the drug Keflex? 8 A. Uh-uh. 9 Q. Okay. Is it your testimony that you 10 were not administered any, the medication Keflex on 11 May 23rd, 2016 at 7:00? 12 A. P.m. or a.m.? 13 Q. P.m. 14 A. It really wouldn't matter because 15 nothing was given to me. 16 Q. Okay. It would have been p.m. but -- 17 A. Yes. 18 Q. That's what 19:00 is, p.m.? 19 A. Yeah. 20 Q. So p.m.? 21 A. There was nothing given to me on the 22 23rd evening. 23 Q. Okay. 24 A. What is Keflex? 25 Q. I mean, I'm not being rude but I'm</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Am I correct that on May 24th, 2016, 2 you were not seen by any medical provider; correct? 3 A. Not by -- let's see, hold on. I don't 4 think so. I think that was the day because I was 5 waiting on my medicines. Oh I did go back to see the 6 nurse, the lady at the nurse's, at the nurse's 7 station, though. 8 Q. That was to check on your meds; right? 9 A. Yes. Also to see if I could see 10 Dr. Awe. That was after morning pill call when they 11 said that I didn't have any medications there. 12 Q. Which nurses did you ask? Do you 13 recall that you spoke to about asking to see Dr. Awe? 14 A. Ms. Tyler and they was very rude to me 15 that day. Her comment to me when I walked up to the 16 nurse's station was you don't look like you're in too 17 much distress, you walked back here and I couldn't 18 believe it. That was that morning that my foot 19 started leaking this green stuff that smelled like 20 rotten meat was coming from between my toes and my 21 foot was getting bigger and swelling even larger. 22 Q. Well, what color was it? 23 A. Purple and red. 24 Q. Okay. Do you understand the difference 25 between administered medication and self-administered</p>
<p style="text-align: right;">Page 23</p> <p>1 asking the questions. 2 A. Oh, okay. 3 Q. I just -- my job is to see what you 4 know. 5 A. I got you. I understand. Yeah. 6 Nothing was given to me on the 23rd. 7 Q. Okay. 8 A. So... 9 Q. Continue from where you left off. 10 A. So I go back in the dorm and then the 11 next morning I wake up and go to pill call and 12 morning pill call there was nothing, noon pill call 13 there is nothing and then evening pill call on the -- 14 wait. No, see, let me think here. Evening pill call 15 on the 23rd. 24th -- wait a minute. I've got my 16 notes right here. I can tell you exactly. 17 On the evening of the 23rd it was 18 Ms. Terry, which was Ms. Grant. I'll have the -- I'm 19 going to have to just do some homework on that to see 20 if it was Ms. Grant or Ms. Terry had said to go back 21 to the dorm. Next morning on the 24th at 7:45 I went 22 to pill call and there is nothing there. Now, this 23 is the day where my foot started leaking green fluid 24 and it shocked me when I got up because it was all 25 over my pillow, all over my sheets in the bunk.</p>	<p style="text-align: right;">Page 25</p> <p>1 medication? 2 A. That they gave me versus I give myself? 3 Q. Yes. 4 A. Yes. 5 Q. When is it that you -- is it your 6 understanding that you received your first 7 antibiotics? 8 A. May 24th at 4:15 p.m. 9 Q. Okay. And what about when did you 10 receive your first pain medication? 11 A. Let me see if it was the evening of the 12 24th or the 25th. On the 25th by Ms Darcy, she gave 13 me a shot. 14 Q. Okay. And I'm not trying to put you on 15 the spot here. You know, we're going to go through 16 the records and you might see something you forgot to 17 mention and, you know, it's not a trick or a game so 18 if you see something and you want to correct 19 something you said or say, I forgot to mention this, 20 it's fine. 21 A. I got you. 22 Q. So we're on the 24th and you -- so you 23 said at 4:45 p.m. to your recollection, that's when 24 you received your first antibiotics. Were they oral? 25 A. 4:15.</p>

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<p style="text-align: right;">Page 26</p> <p>1 Q. 4:15?</p> <p>2 A. No. That's evening pill call. The</p> <p>3 antibiotics were pill form, yeah, capsule form, and I</p> <p>4 took two of them right there and chewed them up. The</p> <p>5 nurse told me that there was no pain medication just</p> <p>6 the -- the foot cream. She said that she didn't see</p> <p>7 any that had been even ordered for me, any pain</p> <p>8 medication. So I went from there back to the dorm</p> <p>9 thinking my foot was going to start getting better</p> <p>10 because of the antibiotics.</p> <p>11 Q. Sure. So between the encounter with</p> <p>12 Dorsey on May 23rd, 2016, which is around noon or</p> <p>13 that's what our records show, it went from that time</p> <p>14 period to 4:15 on the 24th when you first received</p> <p>15 your antibiotics; is that correct?</p> <p>16 A. Yeah.</p> <p>17 Q. So that's roughly 28 hours and 15</p> <p>18 minutes; correct?</p> <p>19 A. Let me see, from the 23rd when I saw</p> <p>20 her, Ms Darcy, I went back to see, let's see what</p> <p>21 time this was on the 24th nurse's station. Yeah. On</p> <p>22 the 24th I went to the nurse's station in the morning</p> <p>23 after the pill call window because there was no</p> <p>24 medications there and my foot -- my foot I needed</p> <p>25 somebody to do something. I mean, I went back there</p>	<p style="text-align: right;">Page 28</p> <p>1 sent me down there. And that was the evening that</p> <p>2 Ms. Greene, I saw Ms. Greene earlier, too.</p> <p>3 Ms. Greene took me into the emergency room. I got up</p> <p>4 on the table and like the fluid, that green fluid was</p> <p>5 leaking out of my foot was all over. She put this,</p> <p>6 this little blue absorbant pad on the table and got</p> <p>7 some gauze and some cleaner and then she just left.</p> <p>8 She just walked out of the room. She didn't help me</p> <p>9 get my foot -- you know, I had that green stuff</p> <p>10 shower shoe, everywhere. Every time I stepped down</p> <p>11 it would leak out and it stunk.</p> <p>12 Q. What day was this?</p> <p>13 A. This was on the 24th.</p> <p>14 Q. The 24th it's your testimony that you</p> <p>15 saw -- you had a medical encounter with Ms. Greene?</p> <p>16 A. Yes. On the evening of the 24th.</p> <p>17 Q. Okay.</p> <p>18 A. And this is also about the time the pink</p> <p>19 streaks are coming up my leg. Let me see, the 23rd.</p> <p>20 Yep. The 23rd is when it started leaking, let's see,</p> <p>21 the 24th is when it started leaking the fluids when I</p> <p>22 woke up.</p> <p>23 Q. Okay.</p> <p>24 A. And the fluid leaked out on my sheets.</p> <p>25 Q. That's a Tuesday; correct?</p>
<p style="text-align: right;">Page 27</p> <p>1 to see the nurses and that's when Ms. Tyler told me</p> <p>2 that, that she said that she didn't think that I</p> <p>3 looked too distress because I walked back there. So</p> <p>4 I did see Ms. Tyler that morning that she, again,</p> <p>5 like I said, she never got up. She never even took</p> <p>6 one look at my foot.</p> <p>7 Q. Okay. Did you --</p> <p>8 A. So -- go ahead.</p> <p>9 Q. I don't remember where we left off but</p> <p>10 if you want to just continue the chronology. We can</p> <p>11 just start from where you, at 4:15 p.m. on the</p> <p>12 24th --</p> <p>13 A. Okay.</p> <p>14 Q. -- when you had the two antibiotic</p> <p>15 pills. What happened next?</p> <p>16 A. I took them and went back to the dorm</p> <p>17 and I got some more Tylenol from the nurses or from</p> <p>18 the officers in the building because I hadn't</p> <p>19 received any medications from medical and after --</p> <p>20 after a few hours I went back to medical. The</p> <p>21 officer let me go back down there and that's when</p> <p>22 Ms. Terry said you don't have a callout, you can't</p> <p>23 keep coming back here. What building are you from?</p> <p>24 And she was acting like she was going to</p> <p>25 try to get Mr. Wooten in trouble, the officer that</p>	<p style="text-align: right;">Page 29</p> <p>1 A. The 24th, so yep.</p> <p>2 Q. And it's your testimony that you asked</p> <p>3 to be seen by a medical doctor?</p> <p>4 A. Yes.</p> <p>5 Q. And that was refused?</p> <p>6 A. I went back to the nurse's station. I</p> <p>7 asked to see Dr. Awe.</p> <p>8 Q. Okay.</p> <p>9 A. And I even made a comment that somebody</p> <p>10 needs to do something because nothing had been done</p> <p>11 still for my foot. I mean, it was killing me.</p> <p>12 Ms. Tyler was sitting behind the desk that morning.</p> <p>13 She looked at me with, I mean, she -- the expression</p> <p>14 her face was one that she wasn't there to help me. I</p> <p>15 even pleaded with her that my foot was hurting and</p> <p>16 that the fluid was coming all over my -- out of my</p> <p>17 foot all over my sheets in the dorm; that the</p> <p>18 medications was supposed to be at the pill call</p> <p>19 window and then that's when she made the comment you</p> <p>20 don't look like you're too much in distress, you</p> <p>21 walked back here. She never even looked at my foot.</p> <p>22 Q. Okay. So answer your question, are you</p> <p>23 familiar with the sick call protocol?</p> <p>24 A. Yep.</p> <p>25 Q. Did you not fill out a sick call slip</p>

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<p style="text-align: right;">Page 30</p> <p>1 for the 24th?</p> <p>2 A. The -- for the 24th, no. I didn't</p> <p>3 because I saw her on the 23rd. I saw her on the 23rd</p> <p>4 so --</p> <p>5 Q. Was anyone preventing you from doing</p> <p>6 that on the 24th?</p> <p>7 A. Preventing me from doing what? Filling</p> <p>8 out the sick call slip? It wouldn't have done any</p> <p>9 good.</p> <p>10 Q. That's your --</p> <p>11 A. It takes three or four days to get stuff</p> <p>12 back or to get an appointment. When we have an issue</p> <p>13 that needs immediate medical help, the officers will</p> <p>14 send us down to medical or they will call a code. So</p> <p>15 the officer that worked in the building knew my foot</p> <p>16 was in bad shape and that's why she let me go back</p> <p>17 down there.</p> <p>18 Q. Okay. And so you arrived there. You</p> <p>19 told the nurses at the station what was going on and</p> <p>20 you asked to see Dr. Awe and they turned you away,</p> <p>21 that's your testimony?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Why don't you tell me about the</p> <p>24 25th because it looks like you saw Dorsey that day.</p> <p>25 A. Uh-huh. Oh, I was going to correct</p>	<p style="text-align: right;">Page 32</p> <p>1 sat there, my foot was on fire. It was extremely</p> <p>2 painful and I asked to see Dr. Awe, again, was denied</p> <p>3 and sat there for several hours and then finally saw</p> <p>4 Ms. Darcy again. I pointed out to her the pink</p> <p>5 streaks coming up my leg to my thigh now and she</p> <p>6 didn't act concerned about it. She didn't even</p> <p>7 acknowledge what I just said.</p> <p>8 She turned around and said I'm going to</p> <p>9 give you a shot of some antibiotics and I was glad to</p> <p>10 hear that and asked her if I could get something for</p> <p>11 pain because it was killing me. So she said after</p> <p>12 finally a few minutes she said she would get me</p> <p>13 something for the pain but when she gave me the shot,</p> <p>14 it didn't do anything.</p> <p>15 I even asked her if I could get some</p> <p>16 help getting to the chow hall because it was hard for</p> <p>17 me to walk. Every time I took a step my foot felt</p> <p>18 like it would explode. It was just extremely</p> <p>19 painful.</p> <p>20 Q. Okay. So you were seen by - just to</p> <p>21 recap for a second.</p> <p>22 A. Okay.</p> <p>23 Q. You were seen by Dorsey on the 23rd and</p> <p>24 you were seen by her again on the 25th?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 31</p> <p>1 something.</p> <p>2 Q. Sure.</p> <p>3 A. Ms. Greene back on the, it was the</p> <p>4 etching of the 22nd when I went back to medical that</p> <p>5 evening so that the nurses could see how bad my foot</p> <p>6 was getting. After I had Ms. Tyler and Ms. Terry try</p> <p>7 to turn me away Ms. Greene took me into the ER that</p> <p>8 night and looked at my foot and said that she thought</p> <p>9 that it was a spider bite and she's the one that gave</p> <p>10 me the callout slip for the next day. So that's how</p> <p>11 I got the callout slip for the next day for the 23rd.</p> <p>12 So the 24th evening, the 25th, on the 25th --</p> <p>13 Q. Well, do you have -- do you know what</p> <p>14 Ms. Greene looks like?</p> <p>15 A. Short lady, short hair not real fat, not</p> <p>16 real skinny, kind of --</p> <p>17 Q. Medium?</p> <p>18 A. -- medium build lady.</p> <p>19 Q. African American woman?</p> <p>20 A. Yes. She's African-American. Ms. Tyler</p> <p>21 is, too.</p> <p>22 Q. All right. So the 25th tell me in your</p> <p>23 words what PA Dorsey did for you on that day?</p> <p>24 A. Okay. All right. On the 25th, again, I</p> <p>25 went back to medical, no callout. At first session</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. Correct? Is there anything else about</p> <p>2 your medical treatment on the 25th that I need to</p> <p>3 know about? Well, on the 25th you were taking</p> <p>4 antibiotics by that point; right?</p> <p>5 A. Yes. The pill form and the shot that</p> <p>6 Ms. Darcy gave me.</p> <p>7 Q. Okay. Do you know the name of the</p> <p>8 antibiotic?</p> <p>9 A. No.</p> <p>10 Q. Okay. Then it seems like -- well,</p> <p>11 you've alleged that it just got worse?</p> <p>12 A. Uh-huh.</p> <p>13 Q. And now on the 26th, back to the 25th</p> <p>14 my notes reflect that your encounter with Dorsey was</p> <p>15 around 8:15. I want to make sure I get this right.</p> <p>16 8:50 in the morning. Is that about right, give or</p> <p>17 take?</p> <p>18 A. I would think it would be a little later</p> <p>19 but, I mean, I don't know.</p> <p>20 Q. We're going to look at the records --</p> <p>21 A. I don't know for a fact.</p> <p>22 Q. We'll figure that out. We'll figure</p> <p>23 that out.</p> <p>24 A. I don't know.</p> <p>25 Q. So on the 26th it looks like you went,</p>

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<p style="text-align: right;">Page 34</p> <p>1 you saw Dorsey around 2:50 in the afternoon. Is that 2 about right? 3 A. On the 26th? 4 Q. Yes, sir. 5 A. That would be right because I sat down 6 there for a few hours waiting to see Dr. Awe. 7 Q. Tell me what she did for you on the 8 26th. 9 A. I asked her to see Dr. Awe again and 10 pointed out that what she had been doing wasn't 11 working. It wasn't even slowing my foot down. My 12 foot was getting worse and she replied that he was 13 busy. And I reiterated that it wasn't working and I 14 was in a lot of pain and the pain shot she gave me 15 didn't work either. She stepped out of the room and 16 when she returned, she gave me two more shots and, 17 again, nothing, no relief from the pain whatsoever. 18 And I had to get help back to the dorm that night 19 when she was finished because my foot was hurting. 20 Q. Let the record reflect that the witness 21 answered that question by reading from his complaint. 22 What page it was of the complaint was that, sir? 23 A. 13. 24 Q. Okay. Thank you. So then tell me what 25 happened after you had seen Ms. Dorsey then you went</p>	<p style="text-align: right;">Page 36</p> <p>1 code, they came down and got me with a golf cart 2 ambulance and took me to the ER where Ms. Jackson, 3 the nurse that was on that evening, looked me over, 4 saw the pink streaks and then she called Ms. Darcy 5 and got Ms. Darcy on the phone, told her that I was 6 in there having chest pain and Ms. Darcy said to run 7 an EKG on me and to call EMS. So that's what they 8 did. 9 EMS gets there, the big dude walks in 10 with gurney, takes one look at my foot and goes wow. 11 That's -- this foot was really infected. I mean, it 12 was crazy big. So they load me up, take me out to 13 the ambulance. He tells me en route to the ambulance 14 that he said I know your foot has got to hurt, he 15 says, but I pick up patients here all the time and I 16 know they really don't give you anything for pain so 17 just hang in there, it's just 15 minutes to Memorial 18 Hospital. 19 So when I get to the hospital, the ER 20 doctor takes a look at my foot and he calls, he tells 21 me he's going to have to have a vascular surgeon come 22 look at my leg, so... 23 Q. And I'm -- I was going to stop you 24 there and we'll return to that but that's what I want 25 to go back now through the medical records during the</p>
<p style="text-align: right;">Page 35</p> <p>1 back to your cell or... 2 A. Yeah. Back to the dorm. This was on 3 the evening of the 26th. 4 Q. Yes, sir. 5 A. And I couldn't lay down so I went and 6 laid -- I went to the TV room and my foot was just 7 throbbing and pounding and was watching the news and 8 there was an inmate in there, his name is Vincent 9 Scott, and he was looking at my foot and he said to 10 me, hey, man, you're going to need to fall out or 11 that foot is going to kill you. 12 And so I hadn't heard that term used 13 before so I asked him what he was talking about and 14 he said you have to claim chest pain because the only 15 way you can get any real help here is to claim chest 16 pain. They don't really gamble with that here and 17 they will send you to the hospital by EMS. So even 18 though my foot was bad as it was, it wasn't bad 19 enough. They sent me back to the dorm that day with 20 the foot the way that it was. 21 So when I got done talking to him, I 22 asked a couple of the other guys in the dorm about it 23 and they said that I should fall out so I could get 24 to a hospital. So that's what I did. I talked to 25 the officer about having chest pains, she called in a</p>	<p style="text-align: right;">Page 37</p> <p>1 period most relevant, the May 22 to 26. This will be 2 State Defendant's Exhibit 2. It's for you. 3 (Thereupon, marked for identification 4 was Defendant's Exhibit 2.) 5 Q. (By Mr. Pontrelli) Mr. Maleeah, these 6 are only some of the medical records. 7 A. Uh-huh. 8 Q. You've had all of those for weeks now 9 but these are the ones that I just picked out that 10 relate to the treatment. I just want to walk through 11 them with you. Neither of us is a medical doctor but 12 I can decipher a good part of it. So on the first 13 page this looks like a bunch of small slips and they 14 just photocopied it so it's several days. 15 If you look on the top little part, 16 look right under where you can see Awe's stamp it was 17 for, I'll just represent to you that was for a visit 18 like on the 17th, so before. So below that you'll 19 see six numbers 1, 2, 3, 4, 5, 6. Under that 20 physician's signature, I'll represent to you that's 21 Dorsey 5/23/2016 at noon. 22 So that's what the records says that 23 Dorsey saw you on May 23rd, 2016 at noon. All right. 24 It looks like the record is reflecting that you were 25 prescribed Keflex, Motrin, some sort of cream.</p>

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<p style="text-align: right;">Page 38</p> <p>1 A. Antifungal cream.</p> <p>2 Q. Yeah. And then I can't read. Please</p> <p>3 give from the stock until it comes from Reidsville.</p> <p>4 And it's your testimony you didn't get any stock?</p> <p>5 A. No stock. She said there wasn't any</p> <p>6 available like that.</p> <p>7 Q. All right. Now, do you see that you</p> <p>8 could see Helen Tyler over but besides Ms. Tyler do</p> <p>9 you see reflected of any other medical provider that</p> <p>10 was engaged on that, at that time on that day?</p> <p>11 A. You talking about the signature here?</p> <p>12 Q. I'm just talking about the record and</p> <p>13 it shows two medical providers. I've told you on the</p> <p>14 left that's Dorsey.</p> <p>15 A. Oh, okay.</p> <p>16 Q. And then you see Helen Tyler but you</p> <p>17 don't see Greene?</p> <p>18 A. Okay. I understand.</p> <p>19 Q. You don't see Greene or Deborah Ivey</p> <p>20 Terry or Grant even though she's not in this case.</p> <p>21 A. Yeah. Just those two, Tyler. I don't</p> <p>22 even know why is Ms. Tyler's name on here?</p> <p>23 Q. She probably transcribed the record is</p> <p>24 my guess. I don't think she treated you. We can</p> <p>25 agree that this Nurse Anderson you sued her for</p>	<p style="text-align: right;">Page 40</p> <p>1 here, the nurse even at the window said that she</p> <p>2 didn't even see that any had been ordered at pill</p> <p>3 call window. All she saw was the Telfinite foot</p> <p>4 cream and the antibiotics. So this stuff, this stuff</p> <p>5 had to have been done after the fact, had to have</p> <p>6 been done.</p> <p>7 I even made that comment at one point</p> <p>8 that it looked like they cleaned these up because</p> <p>9 they never offered any dressings for my foot. Not</p> <p>10 one time did they send me back to the dorm did I have</p> <p>11 any bandages put on my foot. So there would be no</p> <p>12 dressing changes, there would be no dressing on my</p> <p>13 foot to change. There was never anything on it. It</p> <p>14 would leak every time I stepped down.</p> <p>15 The only time I had anything on it was</p> <p>16 the one time when Ms. Greene gave me the gauze, I</p> <p>17 folded up a couple pieces and stuck in between my</p> <p>18 toes and got off the table and that was it. They</p> <p>19 ever one time put even put a Band-Aid on my foot.</p> <p>20 Nothing.</p> <p>21 Q. But I thought you testified that</p> <p>22 Ms Dorsey gave you a shot on the 25th.</p> <p>23 A. Yeah. Yeah. The shot she did but I'm</p> <p>24 talking about when she ordered this medication that</p> <p>25 you're talking about up here on the 23rd, Motrin,</p>
<p style="text-align: right;">Page 39</p> <p>1 delivering indifference to pain relating to pain</p> <p>2 medication after all this; right?</p> <p>3 A. Uh-huh.</p> <p>4 Q. In August?</p> <p>5 A. Right.</p> <p>6 Q. So we're not going to worry about her</p> <p>7 right now. And then on this page there is another</p> <p>8 entry for the 25th and you see that's Dorsey again</p> <p>9 under physician's signature and it shows Rocephin,</p> <p>10 Toradol, return to medical in the morning for</p> <p>11 reevaluation and I don't know what the rest of it</p> <p>12 means, a dressing change.</p> <p>13 A. Yeah. None of this happened.</p> <p>14 Q. That's your testimony that none of this</p> <p>15 happened?</p> <p>16 A. She never, nobody in medical ever</p> <p>17 touched my foot. I did one time and that was when</p> <p>18 Ms. Greene got me the gauze, a bottle of green stuff</p> <p>19 in a green bottle and a pad to put my foot and some</p> <p>20 gauze and that's it. Nobody ever touched my foot and</p> <p>21 I noticed that when you sent me the records and I'm</p> <p>22 going through it, these look like they have been</p> <p>23 doctored up because this stuff didn't happen.</p> <p>24 They didn't touch my foot and the</p> <p>25 Motrin, I never got Motrin. When she ordered it</p>	<p style="text-align: right;">Page 41</p> <p>1 didn't happen; Toradol pain shot had no affect on me</p> <p>2 whatsoever. It could have been a shot of water for</p> <p>3 all I know. It did nothing. My foot continued to --</p> <p>4 Q. Wait a minute.</p> <p>5 A. -- throb.</p> <p>6 Q. It's your testimony that the pain shot,</p> <p>7 the first pain shot you received you're believe it</p> <p>8 was water?</p> <p>9 A. It did nothing, absolutely nothing.</p> <p>10 Q. You wouldn't --</p> <p>11 A. And neither did the second one.</p> <p>12 Q. Going back to the 23rd you would not</p> <p>13 necessarily have known what she wrote in here because</p> <p>14 you weren't going to be walking away from that</p> <p>15 encounter with medication in your hand; right?</p> <p>16 A. I don't know. And I told you and in my</p> <p>17 complaint that what she told me she was going to</p> <p>18 order me some foot cream, some Motrin for the pain</p> <p>19 and some antibiotics but when I went to pill call to</p> <p>20 get it evening, when I actually got it on the 24th,</p> <p>21 you know, the evening of the 24th, the nurse that</p> <p>22 gave me the medication through the window said she</p> <p>23 didn't even see any Motrin that had been ordered for</p> <p>24 me. That's what her comment was to me.</p> <p>25 Q. Well, did you get the cream on the</p>

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<p style="text-align: right;">Page 42</p> <p>1 24th?</p> <p>2 A. I got the cream and the --</p> <p>3 Q. And antibiotics?</p> <p>4 A. And the antibiotics. That was it. That</p> <p>5 was it but.</p> <p>6 Q. So you're alleging that nurse -- excuse</p> <p>7 me, physician's assistant Dorsey doctored the record</p> <p>8 to reflect that she dressed your foot?</p> <p>9 A. Yes. Never not one time did she do</p> <p>10 that.</p> <p>11 Q. But it's accurate that she gave you a</p> <p>12 shot?</p> <p>13 A. Yes.</p> <p>14 Q. Okay.</p> <p>15 A. Yeah. And you know what? On this</p> <p>16 dressing stuff that really bothers me. That</p> <p>17 irritates me to the point of I've got 25 witnesses in</p> <p>18 the dorm that will testify that every time I came</p> <p>19 back from medical there was never a dressing on my</p> <p>20 foot not one time. So, I mean, proving that that was</p> <p>21 doctored is not going to be a problem.</p> <p>22 Q. How do you think you're going to prove</p> <p>23 that it's been doctored?</p> <p>24 A. I mean, because they're saying they put</p> <p>25 dressing on my foot. They never touched my foot</p>	<p style="text-align: right;">Page 44</p> <p>1 continuing to get antibiotics?</p> <p>2 A. Oh, Now, look at this. No. I'm not</p> <p>3 denying the antibiotics. No.</p> <p>4 Q. Okay. Let's go to the next page and</p> <p>5 they are not numbered, so we'll just do it like this.</p> <p>6 One thing I want to ask you about this page, and this</p> <p>7 is called nursing assessment for SOB, slash wheezing</p> <p>8 dated 5/26/16, 19:20, facility, Coastal State Prison.</p> <p>9 At the bottom it says states he saw a PA today for</p> <p>10 lower leg. States left leg and foot have gotten</p> <p>11 bigger; is that correct?</p> <p>12 A. Yeah.</p> <p>13 Q. It says EMS arrived 20:30. Is that</p> <p>14 pretty close?</p> <p>15 A. Oh, okay.</p> <p>16 Q. 9:00?</p> <p>17 A. It could have been. I don't know.</p> <p>18 Q. Oh, 8:30 military time. All right.</p> <p>19 Mr. Maleeah, if you could, we're going to skip over</p> <p>20 the next page that's the one dated 4:00 2015. And go</p> <p>21 to this one IS dated 5/26/2016, 13:05 --</p> <p>22 A. Okay.</p> <p>23 Q. -- which is about 1:05 p.m. on the 26th</p> <p>24 it's reflecting that Ms. Dorsey saw you at that time.</p> <p>25 Is that accurate as far as you know or are you</p>
<p style="text-align: right;">Page 43</p> <p>1 ever.</p> <p>2 Q. Do you have any other evidence other</p> <p>3 than your testimony that --</p> <p>4 A. Witnesses?</p> <p>5 Q. -- the dressing?</p> <p>6 A. I'll line them up for 25 to 30 at a</p> <p>7 time.</p> <p>8 MS. SMITH: I'm going to interject</p> <p>9 because it's difficult for the court reporter when</p> <p>10 you guys talk over each other.</p> <p>11 THE WITNESS: Yeah.</p> <p>12 MS. SMITH: So if you would let him</p> <p>13 finish his question and then when he's done</p> <p>14 answering -- giving his question, if you'll</p> <p>15 respond and it will make it much easier for her.</p> <p>16 THE WITNESS: Okay.</p> <p>17 MS. SMITH: I can feel her frustration.</p> <p>18 THE WITNESS: I got you.</p> <p>19 MS. SMITH: Thank you.</p> <p>20 THE WITNESS: Sorry.</p> <p>21 Q. (By Mr. Pontrelli) All right. So the</p> <p>22 26th you're not denying that you received shots?</p> <p>23 A. No. I know I got the shot, the two</p> <p>24 shots. Yeah.</p> <p>25 Q. You're not denying that you were</p>	<p style="text-align: right;">Page 45</p> <p>1 debating that?</p> <p>2 A. No. I mean, I'll have to look back at</p> <p>3 my notes but on the 26th I saw her earlier that day.</p> <p>4 Yeah that's the evening I went to the hospital. This</p> <p>5 is the day she sent me back to the dorm.</p> <p>6 Q. Okay. And at the last line it says</p> <p>7 Dr. Awe notified of case and concurs with plan. Do</p> <p>8 you have any reason to dispute that?</p> <p>9 A. Dispute it, I don't -- well, I can say</p> <p>10 that Dr. Awe never saw my foot, never seen it so he</p> <p>11 wouldn't know how extremely infected and swollen that</p> <p>12 it was. He didn't see the pink streaks coming up all</p> <p>13 the way up my leg past my belly button; right?</p> <p>14 Q. Okay. But --</p> <p>15 A. The reaction that I got at the hospital</p> <p>16 when I got there was they couldn't believe I came</p> <p>17 from a facility with a physician and one of the</p> <p>18 doctor's comments was what did the doctor at Coastal</p> <p>19 say when he saw these streaks? And I even told him I</p> <p>20 never even got to see the doctor, just the PA and he</p> <p>21 couldn't believe it.</p> <p>22 And then when I told him there was never</p> <p>23 any tests done, which there weren't, they couldn't</p> <p>24 believe that either because the very first thing they</p> <p>25 did was tests, blood work, culture, MRI. The surgeon</p>

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<p style="text-align: right;">Page 46</p> <p>1 picked up my foot and squeezed it and the green stuff</p> <p>2 shot all the way out of my foot and all over both of</p> <p>3 his hands and he placed my foot back down and told me</p> <p>4 that I was probably going to lose my foot.</p> <p>5 That's what his words to me were, that I</p> <p>6 was probably going to lose it. And I'm like, well,</p> <p>7 it was the first time I had even heard anything like</p> <p>8 that. I couldn't believe what I was hearing that my</p> <p>9 foot was going to get cut off. So he said, well,</p> <p>10 let's get the testing done first so we know what</p> <p>11 we're doing.</p> <p>12 Q. I'm trying to keep us in the timeframe.</p> <p>13 A. Okay. Sorry.</p> <p>14 Q. No. That's fine. But you don't know</p> <p>15 what PA Dorsey told Dr. Awe?</p> <p>16 A. No, I don't.</p> <p>17 Q. Okay. And you don't know what he knew</p> <p>18 and what information had been provided to him; right?</p> <p>19 A. No, I don't know that.</p> <p>20 Q. All right. Let's go to the next page.</p> <p>21 I'm sorry these are out of order but I'm not trying</p> <p>22 to confuse you. This is the 25th at 10:00 a.m. So</p> <p>23 it's Dorsey is writing this on the 25th. You</p> <p>24 presented to the pill call room because your foot was</p> <p>25 more swollen; is that correct?</p>	<p style="text-align: right;">Page 48</p> <p>1 you deny that PA Dorsey treated you around noon on</p> <p>2 May 23rd, 2016 as reflected in this record?</p> <p>3 A. No. She did.</p> <p>4 Q. Okay.</p> <p>5 A. That's when she thought my foot had</p> <p>6 athlete's foot.</p> <p>7 Q. Okay. And I wasn't trying to suggest</p> <p>8 when you answered that that I was asking you that you</p> <p>9 were saying this is record is accurate. You've</p> <p>10 already made that clear. I just wanted to make sure</p> <p>11 we're in agreement that you were treated on May 23rd,</p> <p>12 2016 around noon by Dorsey?</p> <p>13 A. Uh-huh.</p> <p>14 Q. Is that a yes?</p> <p>15 A. Yes.</p> <p>16 Q. All right. Next page, please, sir.</p> <p>17 This record reflects that on May 22nd, 2016 at 5:30</p> <p>18 in the morning Nurse Greene saw you; is that correct?</p> <p>19 A. It would have been the evening. Yeah.</p> <p>20 It would have been evening on the 22nd when I saw</p> <p>21 Ms. Greene not the morning because I was down there</p> <p>22 at 3:30 in the morning on the 22nd with Officer</p> <p>23 Screven and Ms. Tyler is the one that sent me back to</p> <p>24 the dorm that day and that evening is when I went</p> <p>25 back down --</p>
<p style="text-align: right;">Page 47</p> <p>1 A. 25th, 23rd, 24th, 25th. No. I didn't</p> <p>2 go to pill call on the morning of the 25th. I</p> <p>3 already had my stuff.</p> <p>4 Q. Did you see Dorsey see on the morning</p> <p>5 of the 25th?</p> <p>6 A. Yes.</p> <p>7 Q. Okay.</p> <p>8 A. That's when I saw her in her office but</p> <p>9 I didn't go to pill call on the 25th.</p> <p>10 Q. Okay. I might have misread.</p> <p>11 A. That's what it says.</p> <p>12 Q. I didn't write it. Next page.</p> <p>13 A. That's made up.</p> <p>14 Q. It looks you saw Campbell on the</p> <p>15 morning at 8:50. Did that not happen, the whole</p> <p>16 record for --</p> <p>17 A. This is the nurse, isn't it?</p> <p>18 Q. Yes. Nurse Campbell.</p> <p>19 A. Yeah. The check-in nurse? So that's</p> <p>20 what time I would have been put through the blood</p> <p>21 pressure, weight, height stuff, I think. No left</p> <p>22 foot redness. There was nothing done to my foot. No</p> <p>23 staff at any time ever touched my foot and I will</p> <p>24 prove that.</p> <p>25 Q. Let's go to the next page, please. Do</p>	<p style="text-align: right;">Page 49</p> <p>1 Q. Okay?</p> <p>2 A. -- and saw Ms. Greene.</p> <p>3 Q. Have you seen any medical record that</p> <p>4 would reflect this early morning visit that you</p> <p>5 talked about on the 22nd with Tyler?</p> <p>6 A. No.</p> <p>7 Q. So is it accurate as of 5:30 p.m. on</p> <p>8 May 22nd, 2016 when you presented to Greene, that</p> <p>9 that you told her you had a throbbing and burning</p> <p>10 left foot?</p> <p>11 A. Right.</p> <p>12 Q. And she observed red on left outer foot</p> <p>13 redness on the extreme. Do you agree with that</p> <p>14 assessment?</p> <p>15 A. Yeah.</p> <p>16 Q. Do you have any -- okay?</p> <p>17 A. Because it was. It was bright red.</p> <p>18 This is the night she told me she thought it was a</p> <p>19 spider bite.</p> <p>20 Q. Did she tell you to apply ice and</p> <p>21 elevate the foot?</p> <p>22 A. I don't remember any instructions of any</p> <p>23 kind from her.</p> <p>24 Q. This record reflects that she</p> <p>25 prescribed you Ibuprofen 200 milligrams, two tabs</p>

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<p style="text-align: right;">Page 50</p> <p>1 every six hours for the pain. Is that -- you're 2 disputing that; right? 3 A. Right. I never got anything. The only 4 medication I got were from the officers in the 5 building. 6 Q. All right. We're going to skip a bunch 7 of pages, one, two, three, four, five, six. We 8 should be looking at Georgia Department of 9 Corrections patient self-administered medication. 10 There is only two entries 5/26/16. Show me what page 11 you're on, Mr. Maleeah. Next page. I'll tell you if 12 that's right. 13 A. (Witness complies with request of 14 counsel.) 15 Q. Next page. Let me see the page. So is 16 that not your signature on 5/22/2016 for Ibuprofen? 17 A. Yes, it's my signature. 18 Q. But it's your testimony you didn't 19 receive that Ibuprofen? 20 A. No. I mean, they slide these things 21 through the pill call window all the time for 22 signatures. I mean, we don't sit there and read each 23 one of them at that time as to what they are for and 24 when we're getting it. 25 Q. But --</p>	<p style="text-align: right;">Page 52</p> <p>1 signed for it 20 cups on, sent on the 25th you signed 2 for that then you've got the Motrin and you signed 3 for that on the 25th, so and then you signed for a 4 tube of cream on the 26th, so you're disputing that. 5 Well, first of all, do you dispute that these are 6 your signatures? 7 A. No. Those are my signatures but there 8 is some backwards here. The Motrin wasn't -- the 9 Motrin and the antibiotics didn't come together, the 10 Telfinite and the antibiotics is what I got. The 11 nurse said there was no Motrin for it so this stuff 12 was given to me. The Keflex and the Telfinite was 13 given to me on the evening of the 24th. So I don't 14 know why this is dated the 25th because I didn't pick 15 it up on the 25th. That's probably why she said I 16 was on the 25th. I didn't go to pill call on the 17 25th, I was at pill call on the 24th. 18 Q. What did you pick up on the 24th? 19 A. Keflex and Telfinite. 20 Q. Okay. And when do you say I got the 21 Motrin? 22 A. I didn't get any Motrin. 23 Q. Ever? 24 A. Ever. 25 Q. Okay.</p>
<p style="text-align: right;">Page 51</p> <p>1 A. Well, this could have been signed, this 2 could have been slipped through the window with the 3 other medications that I received. I didn't get any 4 medication from them at any time for pain, none. 5 Q. So you signed the medical records that 6 state you were getting Ibuprofen without getting the 7 Ibuprofen? 8 A. Yeah. I signed it at the pill call 9 window. 10 Q. You agree that this is a medication you 11 didn't have to wait for Reidsville for this; right? 12 They could have just given it to you and you take it 13 back to dorm. It's Ibuprofen. 14 A. Yeah. No. That's what I'm saying, I 15 didn't receive any of this. 16 Q. Okay. All right. Yeah. I'm sorry 17 about the -- let me see. Probably easiest if you 18 just skip ahead like four or five pages to the next 19 page that has your signature on it. It looks just 20 like the one we were talking about except with the 21 three entries. No. It looks like this, sir. 22 A. Yes. 23 Q. All right. I'm referring to a document 24 that's dated 5/24/2016 in the bottom right corner. 25 You see these entries, sir, 5/23/2016, Keflex, you</p>	<p style="text-align: right;">Page 53</p> <p>1 A. I got two pains shots from her in her 2 office and that was it and aspirin in the building. 3 That was it. That's all I ever received. 4 Q. All right. We're finished with that 5 document. If you could hand it to the court 6 reporter, please. If at any time you need to take a 7 break, just let me know. 8 A. Thank you, sir. 9 Q. Mr. Maleeah, when this happened in May 10 2016, were you familiar with the grievance procedure 11 that any grievance had to be filed within ten days of 12 the violation or the event giving rise to the 13 grievance? 14 A. Not the actual policy or procedure 15 because I never read it at that point but I had filed 16 three grievances total on this incident. 17 Q. Okay. 18 A. And the main one that was the most 19 important to me was to see how my foot was going to 20 heal and what kind of pain I was going to be left 21 with when it was, quote, healed as far as it was 22 going to get. And that's when I filed the last one 23 after I saw Dr. Awe he told me that it was it. That 24 what I have is pretty much what I'm going to live 25 with.</p>

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<p style="text-align: right;">Page 54</p> <p>1 And my foot is constantly bothering me.</p> <p>2 It's tingling, it's numb. The toe next to the one</p> <p>3 they cut off is always asleep. Just like when you</p> <p>4 sit Indian style for too long, you go to stand up and</p> <p>5 it bothering, I mean, it's painful and it doesn't</p> <p>6 stop. My foot actually feels like it was hit by an</p> <p>7 ax. I don't know if you've seen the pictures, but</p> <p>8 they cut me open on the top of my foot all the way</p> <p>9 down and this toe here is asleep.</p> <p>10 And what's crazy is it's actually moving</p> <p>11 over by itself. It used to be right next to this one</p> <p>12 but it helps to compensate for the balance I'm</p> <p>13 starting to try to get back because when I turn left</p> <p>14 and step up, I stumble. It's because of the loss of</p> <p>15 the toe. But this right here, right here, feels like</p> <p>16 it's constantly -- it doesn't like to be touched,</p> <p>17 it's painful and it's numb.</p> <p>18 Q. All right. Let the record reflect that</p> <p>19 the witness removed his left shoe and sock and showed</p> <p>20 us the condition of his foot as of today, May 6,</p> <p>21 2019. And some point in time we'll probably going to</p> <p>22 need pictures of your foot.</p> <p>23 A. That's fine if you have --</p> <p>24 Q. Normally if I had my cell phone, I'd</p> <p>25 take the pictures with your permission but we don't</p>	<p style="text-align: right;">Page 56</p> <p>1 of the three of them. Good thing we're not recording</p> <p>2 this. Let the record reflect I'm sitting in a very</p> <p>3 noisy squeaky seat. So one of your grievances is</p> <p>4 against Nurse Anderson because it's your testimony</p> <p>5 that she declined you pain medication?</p> <p>6 A. Uh-huh.</p> <p>7 Q. Now, how many times did she do that?</p> <p>8 A. Twice.</p> <p>9 Q. So on the same day?</p> <p>10 A. No. Different time, different date.</p> <p>11 Q. You only grieved one of those</p> <p>12 instances, though?</p> <p>13 A. Yes.</p> <p>14 Q. Correct?</p> <p>15 A. Uh-huh.</p> <p>16 Q. That's one grievance that you filed.</p> <p>17 Tell me about the other two one at a time.</p> <p>18 A. The second one was after I saw Dr. Brown</p> <p>19 and she told me there wasn't anything more she could</p> <p>20 do for my foot, that what it is is what it is and the</p> <p>21 medication I'm on is the most that they are going to</p> <p>22 be able to provide for me and that was it. Refilled</p> <p>23 my medications and had nothing else to say to me,</p> <p>24 nothing else she could offer me to offer me any kind</p> <p>25 of help and so I filed a grievance because it was</p>
<p style="text-align: right;">Page 55</p> <p>1 have that, so...</p> <p>2 A. That's fine.</p> <p>3 Q. Why don't you -- you said you filed</p> <p>4 three grievances?</p> <p>5 A. Yep.</p> <p>6 Q. Okay.</p> <p>7 A. Before -- the first one was on</p> <p>8 Ms. Anderson because she denied me medication.</p> <p>9 Q. Okay. That was in August of 2016?</p> <p>10 A. Correct.</p> <p>11 Q. Have you ever filed a grievance before</p> <p>12 then?</p> <p>13 A. Here? No. I don't think so.</p> <p>14 Q. What other prisons have you been in</p> <p>15 before this one?</p> <p>16 A. River Bend, Wilcox, Jackson, Wilcox and</p> <p>17 Jackson.</p> <p>18 Q. How many grievance did you file at</p> <p>19 those prisons?</p> <p>20 A. I don't think I've never filed a</p> <p>21 grievance.</p> <p>22 Q. So you think the August one against</p> <p>23 Anderson was your first?</p> <p>24 A. Yes. I think so.</p> <p>25 Q. August 2016? So let's talk about each</p>	<p style="text-align: right;">Page 57</p> <p>1 unacceptable.</p> <p>2 My foot is still painful, tingling,</p> <p>3 numb. I even asked if I could have the toe next to</p> <p>4 the one that's been cut off cut off just to get it to</p> <p>5 stop doing what its doing, which is asleep, it's</p> <p>6 always asleep. It feels like it's not even mine.</p> <p>7 Like you know when you get a shot at the dentist and</p> <p>8 your face gets numb? You can kind of feel it on the</p> <p>9 outside but you can't feel it on the inside? That's</p> <p>10 what it feels like.</p> <p>11 Q. Well, I'm going to let my co-counsel</p> <p>12 cover Dr. Brown. What was the third.</p> <p>13 A. Dr. Awe. After Dr. Awe told me that I</p> <p>14 had really achieved as much healing as it was going</p> <p>15 to get with the nerves, that the nerves are probably</p> <p>16 going to be like that for the rest of my life and</p> <p>17 that's unacceptable.</p> <p>18 I mean, I didn't want to do any of this.</p> <p>19 If I could have got through this and walked away with</p> <p>20 no issues, I wouldn't -- we wouldn't be sitting here</p> <p>21 today. I want to go home. I didn't want to be tied</p> <p>22 up doing this kind of stuff but my foot hurts and so</p> <p>23 when I was left with here is what you got, here is</p> <p>24 what you're working with, this is where you ended up,</p> <p>25 no. Absolutely not.</p>

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<p style="text-align: right;">Page 58</p> <p>1 My foot is killing me. I like being on 2 my feet and I'm happy to do things and I'm hindered 3 now. My foot hurts all the time. It tingles, it's 4 numb, it wakes me up at night, it stings when I walk 5 about every 100 to 200 yards, I'll get like a bee 6 sting in the top of my foot and I have to stop for a 7 few seconds to minutes get it to stop and then I can 8 move on, all from nerve damage in my foot. So if I 9 didn't have none of that, we wouldn't be here right 10 now. 11 Q. Well, and I do empathize with that and 12 I understand what it would feel like to lose a toe in 13 that manner so I'll try to be inconsiderate. I'm 14 here to figure out what's going on with your 15 allegation. Let me ask you a question then. I'm not 16 suggesting they did anything wrong but based on what 17 you just told me I understand why Tony Anderson is in 18 this case and I understand why you included Dr. Brown 19 in this case. Now, the Court kicked out Dr. Awe 20 based on everything that has been presented. So why 21 are Greene, Tyler, Dorsey Ivey Terry or Nurse Grant 22 why are they in this case? 23 A. You want me to explain them individually 24 or... 25 Q. It sounds like you were complaining</p>	<p style="text-align: right;">Page 60</p> <p>1 dragging my foot and the green stuff on the floor 2 literary, they wouldn't get off their butt to come 3 and take a look. They were more interested in 4 whether I had a callout slip to be there and sent me 5 back to the dorm. That was it. 6 So my complaint with them is if they 7 would have done something, helped me out, got up, 8 looked, wow, this guy has got a really bad infection, 9 we need to do something here and then done it 10 whatever it is. 11 Like when I got to the hospital, boy, 12 they were clicking on all cylinders and they got me 13 taken care of and it cost me part of my foot to stop 14 it. But the doctor, the surgeon told me that my foot 15 had a nephritizing infection. That meant my foot was 16 dying, the bones were being turned to liquid and I 17 came from a facility with a physician. 18 I shouldn't have been in that condition, 19 I shouldn't have been that bad. They should have 20 been able to intervene and stop it like they did but 21 at the point I got there that was the damage that I 22 had incurred. 23 Q. Well, we just covered a lot of days of 24 medical records and you've acknowledged you disputed 25 some of the specifics and you even acknowledge that</p>
<p style="text-align: right;">Page 59</p> <p>1 about things that happened after your surgery. 2 A. No. 3 Q. Your grievances were related to after 4 your surgery. 5 A. All of my grievances with Dr. Awe are 6 based on where my foot had healed up and here is 7 where I was at. 8 Q. So -- 9 A. As far as the treatment that I received 10 prior to the surgery, if I would have had proper 11 treatment, I wouldn't have required the surgery. If 12 they would have done some tests and figured out what 13 kind of infection I had going on, they could have 14 stopped it. 15 The first thing they did at the hospital 16 was tests. They did no tests here. They kept 17 sending me back to the dorm and that's what I didn't 18 understand either. Nobody understood that why they 19 wouldn't they do that. Why wouldn't they do blood 20 work to see what the heck was going on; right? 21 Why didn't they -- why didn't they do a 22 swab like they did at the hospital to find out what 23 was going on with the wound? They never did none of 24 that and so I'm upset with all of them because they 25 are trained nurses and when I got here literally</p>	<p style="text-align: right;">Page 61</p> <p>1 you were seen on the 22nd, the 23rd, 23rd, the 25th 2 and the 26. 3 A. Yes. 4 Q. Okay. So they weren't ignoring you? 5 A. No. They weren't doing anything to 6 discover what was wrong with me. Here is what an 7 examination was, Mr. Pontrelli. That was it, this. 8 Q. You're not a medical doctor; correct? 9 A. No. 10 Q. So you can't offer any kind of opinion 11 or -- 12 A. None whatsoever. 13 Q. -- standard of care? 14 A. Zero. 15 Q. Okay. So -- 16 A. There is one other point I want to make. 17 Q. Sure. 18 A. When the pink streaks were coming up my 19 leg gradually, my thigh, my -- up here, and then up 20 past my belly, to my belly button, I mean, they were 21 obvious that I had something seriously wrong, majorly 22 wrong, and, like I said, I'm not an expert but I knew 23 those streaks meant trouble and when I pulled them up 24 the night that I fell out and showed the officer in 25 the building, she wouldn't believe it.</p>

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<p style="text-align: right;">Page 62</p> <p>1 She knew at a glance that there was</p> <p>2 something seriously wrong with me and that's why she</p> <p>3 called the code. I was sent back to the building</p> <p>4 that night by Ms. Darcy, which when I got to the</p> <p>5 hospital that night, the surgeon said my leg was</p> <p>6 necrotizing and Ms. Darcy sent me back to the dorm</p> <p>7 with my leg dying and the records say that.</p> <p>8 Q. I know this is very emotional for you.</p> <p>9 A. It's my leg.</p> <p>10 Q. I understand that but --</p> <p>11 A. And that's the facts.</p> <p>12 Q. Back to the grievance, sir. You never</p> <p>13 filed ha grievance against Nurse Greene?</p> <p>14 A. No.</p> <p>15 Q. And you never filed a grievances</p> <p>16 against Helen Tyler?</p> <p>17 A. No.</p> <p>18 Q. And you never filed a grievance against</p> <p>19 Anna Dorsey?</p> <p>20 A. No.</p> <p>21 Q. You've never filed a grievance against</p> <p>22 Deborah Ivey Terry?</p> <p>23 A. No.</p> <p>24 Q. And you never filed a grievance against</p> <p>25 Nurse Grant, whoever she is?</p>	<p style="text-align: right;">Page 64</p> <p>1 Q. (By Mr. Pontrelli) All right. I'll</p> <p>2 represent to you this is a true and correct copy of</p> <p>3 the complaint that you filed in this matter of</p> <p>4 document docket number one dated April 27th, 2018</p> <p>5 consisting of 22 pages and the main document 22 pages</p> <p>6 in the document one, dash, one; and then 31 pages in</p> <p>7 document marked one, dash, two; and then there is one</p> <p>8 page document, one, dash, three, and then the last</p> <p>9 page is one, dash, four and is the copy of the</p> <p>10 envelope you used to mail it in. So luckily for this</p> <p>11 document we have page stamps so we'll all quickly get</p> <p>12 to the right page. Why don't we go to document one,</p> <p>13 page five of 22.</p> <p>14 A. Okay.</p> <p>15 Q. Paragraph six, it's your testimony that</p> <p>16 Ms. Tyler was present at the premises was that 3:00</p> <p>17 a.m.?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. That would have been on Sunday,</p> <p>20 May 22nd?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Next page marked page six,</p> <p>23 actually, we're not going to ask any questions about</p> <p>24 that page. Sorry. Let's skip ahead to page nine.</p> <p>25 A. Okay.</p>
<p style="text-align: right;">Page 63</p> <p>1 A. No.</p> <p>2 Q. Okay. You filed a grievance against</p> <p>3 Tony Anderson, Dr. Awe and Dr. Brown; correct?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Do you know -- well, let me --</p> <p>6 A. Mr. Pontrelli, can I ask you a question?</p> <p>7 Q. I'm probably not going to answer it.</p> <p>8 A. I just -- I have a hard time with a</p> <p>9 couple things. But you are one of the highest</p> <p>10 ranking law officials in the state of Georgia.</p> <p>11 Q. I mean, you could talk but I'm not</p> <p>12 going to respond to any of this.</p> <p>13 A. Well, I'm just curious why I'm not being</p> <p>14 also protected by you. I'm in the custody of the</p> <p>15 state of Georgia and I would think that if you saw</p> <p>16 that something happened here that wasn't right that</p> <p>17 the wrath that you would send would be towards the</p> <p>18 problem not towards the other way.</p> <p>19 Q. Well, I'm not going to respond to that.</p> <p>20 I'm not going to. Within reason I'm going to cut you</p> <p>21 off when you're talking but I'll give you your say</p> <p>22 but I don't have any response to that one way or the</p> <p>23 other. So let's mark this as Exhibit 3.</p> <p>24 (Thereupon, marked for identification</p> <p>25 was Defendant's Exhibit 3.)</p>	<p style="text-align: right;">Page 65</p> <p>1 Q. And page ten and I'm referring to</p> <p>2 paragraphs 12 and 13. I think it was a typo here but</p> <p>3 you just confirm it for me. On page 12 it says</p> <p>4 Tuesday, May 24, 2016 at 12:10 a.m., and on the next</p> <p>5 page it refers to Tuesday, May 24th, 2016 at four --</p> <p>6 A. 15.</p> <p>7 Q. -- 15 p.m. Was that first entry</p> <p>8 supposed to be 12:10 p.m. and not a.m.?</p> <p>9 A. Oh, yeah. Yeah. Yeah.</p> <p>10 Q. You do agree with me; right?</p> <p>11 A. Yes.</p> <p>12 Q. Otherwise, it makes no sense.</p> <p>13 A. Yeah. It's noon pill call.</p> <p>14 Q. So the record reflects that paragraph</p> <p>15 12 on page nine of document one, Exhibit 3, is 12:10</p> <p>16 p.m. not a.m.?</p> <p>17 A. Good catch, Mr. Pontrelli.</p> <p>18 Q. Let's see, all right. Skip ahead to</p> <p>19 document one, dash, one, which is your affidavit, and</p> <p>20 go to page 22, final page.</p> <p>21 A. One, dash, one you said?</p> <p>22 Q. Yes, sir. The signature page of your</p> <p>23 affidavit.</p> <p>24 A. Oh, yeah. Yes, sir.</p> <p>25 Q. Okay. That's your signature there?</p>

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<p>1 A. Yes.</p> <p>2 Q. And on April 22nd, 2018 you were</p> <p>3 attesting that you were declared under the penalty of</p> <p>4 perjury that the foregoing statements of facta are</p> <p>5 true and correct?</p> <p>6 A. Yes.</p> <p>7 Q. All right. So you did make that</p> <p>8 declaration; correct?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Next page, pages of the document</p> <p>11 page two and three, who took those two pictures, sir?</p> <p>12 A. The hospital.</p> <p>13 Q. Okay. And how did you come into</p> <p>14 possession of the pictures?</p> <p>15 A. I asked for them.</p> <p>16 Q. Now, do you have a better quality of</p> <p>17 the picture of this? Do you have the actual photos?</p> <p>18 A. Yeah.</p> <p>19 Q. Okay. You have two of them?</p> <p>20 A. Yes.</p> <p>21 Q. All right. I'd ask you -- just to put</p> <p>22 you on notice that we'd like you to keep them and --</p> <p>23 MS. SMITH: If we could get her to copy</p> <p>24 them, make a color copy of them and send them back</p> <p>25 to him.</p>	<p>1 Q. Is he still here?</p> <p>2 A. No. He's gone.</p> <p>3 Q. Is he out of the system or is he in</p> <p>4 another prison?</p> <p>5 A. I don't even know.</p> <p>6 Q. All right.</p> <p>7 A. We don't have a way of tracking that.</p> <p>8 Q. Next page, W. Curt Butts.</p> <p>9 A. He's out.</p> <p>10 Q. He's out of the system, as far as you</p> <p>11 know?</p> <p>12 A. Yeah.</p> <p>13 Q. All right. Next Timothy Bowman.</p> <p>14 A. He's here.</p> <p>15 Q. Before I go too far, let's go back to</p> <p>16 Mr. Wayne. Mr. Wayne was never present with you</p> <p>17 during your medical care during May 22 to 26 at</p> <p>18 Coastal?</p> <p>19 A. He was just in the dorm.</p> <p>20 Q. All right. Same with Mr. Butts, he</p> <p>21 never observed --</p> <p>22 A. No.</p> <p>23 Q. We talked over each other.</p> <p>24 A. I'm sorry.</p> <p>25 Q. He didn't observe any of the medical</p>
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<p>1 Q. (By Mr. Pontrelli) Would you be</p> <p>2 willing to have the court reporter --</p> <p>3 A. I'm not, but I believe you can get them</p> <p>4 here, you can.</p> <p>5 Q. Well --</p> <p>6 MS. SMITH: I don't have any control</p> <p>7 over that.</p> <p>8 THE WITNESS: Or you can take a picture</p> <p>9 of them with your phone.</p> <p>10 MS. SMITH: I don't have a phone.</p> <p>11 THE WITNESS: Oh.</p> <p>12 MR. PONTRELLI: Well, we'll just put on</p> <p>13 the record that Mr. Maleeah did show us two color</p> <p>14 photos of his feet and he'll hold on to those.</p> <p>15 THE WITNESS: Yeah. I sent them papers</p> <p>16 and everything for the hospital.</p> <p>17 Q. (By Mr. Pontrelli) All right. Now,</p> <p>18 there is a bunch of witness statements talking --</p> <p>19 starting on page four of 31 of document one, dash,</p> <p>20 two as it's stamped on the top. First one is Thomas</p> <p>21 Wayne Robertson.</p> <p>22 A. Uh-huh.</p> <p>23 Q. I don't want to go over what he said</p> <p>24 but who is Thomas Wayne Robertson?</p> <p>25 A. It's an inmate in the M dorm, MB dorm.</p>	<p>1 care you received?</p> <p>2 A. No.</p> <p>3 Q. Okay. Mr. Bowman you said is still</p> <p>4 here? And he didn't observe any of your medical</p> <p>5 care; correct?</p> <p>6 A. No.</p> <p>7 Q. Mitchell DeWayne Peters, who is he?</p> <p>8 A. Just another inmate in M building.</p> <p>9 Q. Is he still here?</p> <p>10 A. No. He's out.</p> <p>11 Q. All together out?</p> <p>12 A. Out.</p> <p>13 Q. All right. Did he observe any of the</p> <p>14 medical care you received at Coastal in May?</p> <p>15 A. No.</p> <p>16 Q. Next is David Scott.</p> <p>17 A. Uh-huh.</p> <p>18 Q. Who is he?</p> <p>19 A. He's out.</p> <p>20 Q. And same question, did he observe any</p> <p>21 of your medical care?</p> <p>22 A. Yeah. No.</p> <p>23 Q. Vincent Scott.</p> <p>24 A. He's same thing, he's out, I believe.</p> <p>25 Q. Okay. And he didn't observe any</p>

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<p style="text-align: right;">Page 70</p> <p>1 medical care?</p> <p>2 A. He's the one that told me to call out.</p> <p>3 Q. All right. So he observed, you know --</p> <p>4 I mean, most of the these are people that saw the</p> <p>5 condition of your foot?</p> <p>6 A. Yeah.</p> <p>7 Q. Okay.</p> <p>8 A. And the number of times I went to</p> <p>9 medical and came back with no dressings, no bandages,</p> <p>10 no nothing on my foot.</p> <p>11 Q. Fair enough. Joseph Upshaw?</p> <p>12 A. Here.</p> <p>13 Q. Is he still here?</p> <p>14 A. Yep.</p> <p>15 Q. And he didn't observe any of your</p> <p>16 medical care?</p> <p>17 A. No.</p> <p>18 Q. David Michael Haggerty?</p> <p>19 A. He's a walker.</p> <p>20 Q. And he didn't observe any of your</p> <p>21 medical care?</p> <p>22 A. No.</p> <p>23 Q. Anthony?</p> <p>24 A. Yawn. He's here.</p> <p>25 Q. And he didn't observe any of your</p>	<p style="text-align: right;">Page 72</p> <p>1 we're all sort of involved with each other everyday.</p> <p>2 Q. Were you reporting back to him the</p> <p>3 nature of the care you were receiving on your --</p> <p>4 A. I mean, I always bounced it off of him</p> <p>5 because he knows what's going on.</p> <p>6 Q. But he's not the -- he's not the</p> <p>7 witness who told you to fake a heart attack to get</p> <p>8 out?</p> <p>9 A. That was Vincent Scott. Yawn was more</p> <p>10 of telling me what's up with my foot.</p> <p>11 Q. So you showed your foot to Yawn on May</p> <p>12 22nd?</p> <p>13 A. He saw it everyday.</p> <p>14 Q. Everyday during this time period?</p> <p>15 A. And he also saw there was never any</p> <p>16 bandages, no dressings, no nothing on my foot.</p> <p>17 Q. Next page, who is this?</p> <p>18 A. Randy Peoples, he's out.</p> <p>19 Q. Out of the system?</p> <p>20 A. I think so.</p> <p>21 Q. He didn't observe your medical care;</p> <p>22 right?</p> <p>23 A. No.</p> <p>24 Q. To be clear, let's go back to Yawn. He</p> <p>25 was not there when you were receiving the medical</p>
<p style="text-align: right;">Page 71</p> <p>1 medical care?</p> <p>2 A. No. He's still here and he actually --</p> <p>3 he's a PA. He had a bunch of probably emergency care</p> <p>4 facilities on the street so he's pretty knowledgeable</p> <p>5 about medical and he was involved talking to me,</p> <p>6 looking at my foot and was instrumental in me</p> <p>7 starting my lawsuit.</p> <p>8 Q. I assume -- well, Anthony Yawn?</p> <p>9 A. Uh-huh.</p> <p>10 Q. Okay. He signed his statement on April</p> <p>11 17, 2017; correct?</p> <p>12 A. Yes.</p> <p>13 Q. Was he, to your knowledge, had he lost</p> <p>14 his license by that time, to your knowledge?</p> <p>15 A. He's been in prison for a while, so,</p> <p>16 yeah. He's just knowledgeable about medical. I</p> <p>17 don't know when he lost his license or for what, but</p> <p>18 he -- he knows a lot about medical about, well, what</p> <p>19 was going on with my foot.</p> <p>20 Q. It looks like his statement is that he</p> <p>21 started looking at your foot as of May 22nd, 2016?</p> <p>22 A. Yeah. I was in the same dorm with him.</p> <p>23 Q. So were you reporting to him during</p> <p>24 this period of time?</p> <p>25 A. We're in the same dorm, so, I mean,</p>	<p style="text-align: right;">Page 73</p> <p>1 care but it sounds like he's the one witnessing you</p> <p>2 as to what happened?</p> <p>3 A. Yeah.</p> <p>4 Q. You were him in on it; correct?</p> <p>5 A. Yeah.</p> <p>6 Q. All right. Ronny Ashbey?</p> <p>7 A. He's, I think he's at Walker.</p> <p>8 Q. Okay. He didn't observe you --</p> <p>9 A. No.</p> <p>10 Q. Your medical care? Anthony Wheeler?</p> <p>11 A. He's out and he didn't witness any of</p> <p>12 the medical. These guys are all just witnesses in</p> <p>13 the dorm.</p> <p>14 Q. All right. Let's see, let's go all the</p> <p>15 way to page 21 of 31 of document one, dash, two. It</p> <p>16 looks like you marked it Exhibit 21?</p> <p>17 A. Yes.</p> <p>18 Q. At the bottom do you know whose</p> <p>19 signature that is for counselor's signature?</p> <p>20 A. Ms. Rivers.</p> <p>21 Q. And it looks like she signed it on</p> <p>22 November 9th, 2016?</p> <p>23 A. Uh-huh.</p> <p>24 Q. Okay. Let's skip ahead to page 25 of</p> <p>25 31, which you've marked as Exhibit 25.</p>

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<p style="text-align: right;">Page 74</p> <p>1 A. Okay.</p> <p>2 Q. Who is Brianna Caegler?</p> <p>3 A. She's a counselor.</p> <p>4 Q. So she signed on November 7th, 2016 for</p> <p>5 what you call the second grievance on Dr. Brown?</p> <p>6 A. Yes.</p> <p>7 Q. And you never received a response to</p> <p>8 that grievance; correct?</p> <p>9 A. No.</p> <p>10 Q. All right. Then below it says third</p> <p>11 grievance filed against Dr. Awe. And who signed</p> <p>12 that, Rivers?</p> <p>13 A. Counselor Valcure.</p> <p>14 Q. Valcure. And that was signed on May</p> <p>15 2nd, 2017?</p> <p>16 A. Yep.</p> <p>17 Q. And you never received a response on</p> <p>18 that one either; right?</p> <p>19 A. No.</p> <p>20 Q. Now, the one against Nurse Anderson,</p> <p>21 which looks like it's page 16 of 31.</p> <p>22 A. Uh-huh.</p> <p>23 Q. You did receive a response to that</p> <p>24 grievance; right?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 76</p> <p>1 Q. To your knowledge? All right. Tell me</p> <p>2 in your own words starting on page, what is your page</p> <p>3 two under new defendant and you could read part of it</p> <p>4 or, you know, add more information but just tell me</p> <p>5 what your complaint is what you think Ms. Rivers did</p> <p>6 wrong.</p> <p>7 A. Ms. Rivers just has not processed my</p> <p>8 grievance. She's not followed back up with me on any</p> <p>9 of the notes that I sent her asking her for the</p> <p>10 status or the update on any of them. The appeal, I</p> <p>11 never got asked for an extension on the grievances</p> <p>12 that I filed after that, she never offered me any</p> <p>13 extensions. It's almost like she just threw them</p> <p>14 out.</p> <p>15 Q. And this is for the three grievances we</p> <p>16 talked about earlier?</p> <p>17 A. The first one the only thing that's</p> <p>18 ever been processed was the first got up through</p> <p>19 Warden Morales and that's it. And I saw her on</p> <p>20 the -- let me tell you, it's right here, on 11/9 when</p> <p>21 I filed the appeal in Ms. Rivers office, I talked to</p> <p>22 her about the second grievance that I filed on</p> <p>23 Dr. Brown so, I mean, we had a meeting in her office</p> <p>24 that day about both of those. She was going to give</p> <p>25 me a copy of the appeal and she never did and that</p>
<p style="text-align: right;">Page 75</p> <p>1 Q. And they denied it?</p> <p>2 A. They denied it, yes.</p> <p>3 Q. And then you appealed it?</p> <p>4 A. Yes.</p> <p>5 Q. And did you ever receive a response to</p> <p>6 the appeal?</p> <p>7 A. No. No response.</p> <p>8 Q. Okay. I believe I'm finished with that</p> <p>9 Exhibit. If you could, hand that to the court</p> <p>10 reporter, please.</p> <p>11 (Thereupon, marked for identification</p> <p>12 was Defendant's Exhibit 4.)</p> <p>13 Q. (By Mr. Pontrelli) Okay. I've shown,</p> <p>14 Mr. Maleeah, what I've marked as State Defendant's</p> <p>15 Exhibit 4 and it is the stamping on it through the</p> <p>16 Federal Court Document System, is document 41. It's</p> <p>17 a nine page document with no attachments filed March</p> <p>18 6th, 2019. This is your motion to amend complaint to</p> <p>19 add chief counselor and grievance --</p> <p>20 A. Coordinator.</p> <p>21 Q. -- coordinator, Ms. Rivers?</p> <p>22 A. Right.</p> <p>23 Q. And the court has allowed you to add</p> <p>24 Ms. Rivers to the case; correct?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 77</p> <p>1 was the end of it. I never heard another thing back</p> <p>2 from her on those. So then I sent the letters to the</p> <p>3 commissioner. I sent them trying to get him to look</p> <p>4 at it and see why I'm not getting any response to the</p> <p>5 procedure that's supposed to be in place for us to</p> <p>6 voice our concerns. That's what the grievance</p> <p>7 procedure is supposed to be for and I've got multiple</p> <p>8 people in the dorm that have filed grievances and</p> <p>9 gotten nowhere, no reply, no response.</p> <p>10 Q. Are you aware of the fact that, you</p> <p>11 know, in that situation after a certain period of</p> <p>12 time then you're free to go ahead and file a lawsuit?</p> <p>13 A. I wasn't aware of that, file a lawsuit</p> <p>14 on the grievance.</p> <p>15 Q. Well, you have filed a lawsuit</p> <p>16 obviously?</p> <p>17 A. Yeah. But not the for the grievance</p> <p>18 part. I filed the lawsuit because of my foot, what</p> <p>19 they did to my foot, what they didn't do to my foot.</p> <p>20 Q. No. But your claim against -- that's</p> <p>21 not completely true because your claim against</p> <p>22 Ms. Rivers is that she didn't process the grievance.</p> <p>23 A. That's right.</p> <p>24 Q. So what I'm asking you is are you aware</p> <p>25 that if the grievance doesn't get processed, you're</p>

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<p style="text-align: right;">Page 78</p> <p>1 still able to file a lawsuit based on that 2 allegation? 3 A. I didn't know that. 4 Q. And other than saying she didn't 5 process the grievance, did she injure you or harm you 6 in any other way? 7 A. No. That's why I didn't bring her in 8 until late in the deal and the only reason I did was 9 because failure to exhaust grievance procedure was 10 going to be used as a possible defense and I had done 11 everything in my knowledge and in my power at that 12 time that I could push it as far as I could including 13 writing the commissioner. 14 Q. So that's why you added Ms. Rivers is 15 because your concern it was going to be failure to 16 exhaust argument with your Dr. Awe, Anderson and 17 Brown grievances? 18 A. Yes. 19 Q. Okay. Could you go to page five of 20 nine on document 41. 21 A. Yes. 22 Q. When you say under exhibits with a 23 little asteric on each side of it, a few lines down 24 you said I got my med s after multiple visits to pill 25 call on 5/24/2016 evening pill call. The meds show a</p>	<p style="text-align: right;">Page 80</p> <p>1 Q. Okay. So this will be the good time to 2 take a quick break. 3 (A 4-minute recess was taken.) 4 (Thereupon, marked for identification 5 was Defendant's Exhibit 5.) 6 Q. (By Mr. Pontrelli) All right. All 7 right. Mr. Maleeah, I'll show you what we've marked 8 as State Defendant's Exhibit 5. Do you recognize 9 this pleading? 10 A. Yes, sir. 11 Q. Okay. And it's something you filed; 12 correct? 13 A. Yes. 14 Q. All right. Okay. It's titled motion 15 to amend his complaint and specific medical records 16 as Exhibits, rather, as Exhibits one through 36 17 included in your general complaint. It looks like 18 the first five pages you have some commentary on the 19 attached medical records. So why don't you starting 20 on page two of this document why don't you just go 21 through these few pages and then tell me and 22 reference the Exhibit numbers to the extent you 23 remember to. Just tell me what your complaints are 24 about the records or what your observations are about 25 these records? What are you trying to say here?</p>
<p style="text-align: right;">Page 79</p> <p>1 stamped received date at Coastal on 5/24/2016. What 2 does that refer to a stamped received date? What are 3 you talking about? 4 A. On the card that you sign. 5 Q. You're talking about the medical 6 records that we went over? 7 A. Yeah. 8 Q. Oh, I was just wondering if it was like 9 you had -- 10 A. That's what because remember they are 11 saying it was the 25th. I got them on the 24th. 12 Q. Do you still -- 13 A. I didn't go to pill call on the 24th. 14 Q. Do you still have a copy? What I was 15 getting at do you still have that medication? 16 A. The medication? 17 Q. The container. 18 A. Huh-uh. 19 Q. The bottle, the box? 20 A. That's in a bubble -- the lotion it's 21 just in a box and it doesn't have anything on it and 22 then the antibiotics were in a bubble pack thing and 23 when it's empty, you have to throw it out, if not, 24 the officers are going to throw your box. You can't 25 keep that stuff.</p>	<p style="text-align: right;">Page 81</p> <p>1 A. Okay. So number 37 Ms. Darcy ordering 2 the medications, pulling meds from stock never 3 happened. 4 Q. Okay. 5 A. So that's what, see, when I look book 6 and see these things written like this, I know they 7 doctored this stuff up because that never happened. 8 They never even offered me anything at the pill call 9 windows. There will never be a slip or anything from 10 the pill call windows that show I was given any of 11 this medication. It didn't happen, so why would they 12 write that other than trying to doctor up the record? 13 So that's the point that I'm trying to point out to 14 the court. 15 Q. Thank you. 16 A. And the Motrin being listed as something 17 that was ordered I never received any of the Motrin 18 either. The two shots, the Toradol that was wrote 19 down on the paper, I don't know what Toradol is but I 20 know it did nothing, absolutely didn't dull or stop 21 the pain at all. When I got to the hospital and got 22 a shot, they stopped it one shot, whack and it quit 23 hurting. 24 And then like the way that I could read 25 the records it shows one day only one shot. It</p>

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<p style="text-align: right;">Page 82</p> <p>1 showed a record of one shot only on the 26th and I 2 got two, so that part I didn't understand. So in 3 point of records being doctored up or whatever word 4 you want to use aren't accurate on their side. Like 5 the dressing changes, inaccurate, never happened. 6 MS. SMITH: Did you go to the next page, 7 sir. 8 THE WITNESS: Yeah. 9 Q. (By Mr. Pontrelli) If you could, try 10 to remember which Exhibit number you're talking about 11 now when you switch to the next Exhibit, just -- 12 A. Okay. So we're on number 37, the 13 Toradol shot did nothing. The dressing changes never 14 happened. 15 Q. Okay. 16 A. The 26th that show when I had two shots 17 but the record shows one. Let's see, the 26 entry 18 shows two shots same as complaint; however, the shot 19 records on Exhibit number 38 shows record of one shot 20 only on the 26th and I got two. The Motrin, the next 21 page Exhibit 39 on the 25th for the Motrin and 22 antibiotics I didn't get it. I got the foot cream 23 and the antibiotics and that was it and the nurse in 24 the window told me that it didn't like any had been 25 ordered.</p>	<p style="text-align: right;">Page 84</p> <p>1 A. Yeah. 2 Q. The middle of five. 3 A. Because it used to be right over here 4 next to this one and now it's over here and it's 5 actually my stumbling has improved but it's not gone. 6 Q. So you're saying that your -- well, 7 what once was the middle of five toes used to be 8 closer to your -- 9 A. The big toe. 10 Q. Or actually here, on your hand you were 11 showing your ring finger. 12 A. See how these\ together anymore? 13 Q. Yes. 14 A. I'll show you on this foot because that 15 was a twin to this one. 16 Q. Okay. I understand. 17 A. So it's compensating by itself and 18 that's amazing that your body knows how to do that. 19 I'll tell you another amazing thing. They never put 20 a stitch it in, not one stitch and it closed all by 21 itself. It took two-and-a-half months for it to 22 close but it closed it. 23 Q. You don't have any criticism of the 24 medical care you received at Memorial; correct? 25 A. No.</p>
<p style="text-align: right;">Page 83</p> <p>1 Q. Okay. 2 A. Okay. So number 40 concurs with 3 complainant having to fall out to get some meaningful 4 medical care or intervention. Ms. Jackson pretty 5 much summed it up with her reports of everything that 6 I put in my complaint, that she spoke to Ms Darcy. 7 Ms Darcy told her to go ahead and call EMS, do the 8 EKG and she thought I had a blood clot. 9 Q. Okay. 10 A. Number 42 shows a visit to medical after 11 I fell off of a ladder. My foot gave out and I tore 12 the meniscus in my knee when I landed on the floor. 13 I had fallen a few times but when I turned left and 14 stepped off and put my weight on the left side of my 15 foot, it won't support when I turn hard and it causes 16 me to stumble a lot and people think I've been 17 drinking. I mean, it's because that toe being gone 18 it can't support my weight. That's why what's weird, 19 this toe is actually moving over now by itself. The 20 doctor even told me it was going to do that. It's 21 amazing how your body knows how to do that. 22 Q. When you said this toe, you mean what 23 would have been your middle? 24 A. This one is scooting over. 25 Q. The middle toe?</p>	<p style="text-align: right;">Page 85</p> <p>1 Q. All right. Let's go back to -- let the 2 record reflect that the witness removed both shoes 3 and socks from each foot to show us what he was 4 referring to in the comparison. Let's finish up with 5 this. I think we're up to 40. 6 A. Okay. 41. 7 Q. Or apparently we're at 42. Good. 8 A. Okay. 41 was just the confirmation that 9 none of the pain medication that I received from 10 medical worked. Okay. And then when I fell off the 11 ladder. 12 Q. I don't think -- 13 A. Actually, this one here I injured my 14 elbow. 15 Q. I think the rest of this is post 16 surgery so we don't need to cover any of it. So you 17 can hand that Exhibit to the court reporter. 18 (Thereupon, marked for identification 19 was Defendant's Exhibit 6.) 20 Q. (By Mr. Pontrelli) All right. I'm 21 showing you what I've marked State Defendant's 22 Exhibit 6. This is document 44 in the docket, five 23 page document. It's titled motion to notify court 24 and counsel for defendant as to Coastal State Prison 25 medical staff claiming to have lost medical records</p>

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<p style="text-align: right;">Page 86</p> <p>1 and doctors order to change meds. You prepared this</p> <p>2 pleading; correct, sir?</p> <p>3 A. Yes.</p> <p>4 Q. Does this pleading have anything to do</p> <p>5 with the medical care you received the time period of</p> <p>6 May 22nd, 2016 to May 26th, 2016?</p> <p>7 A. It's the medications I'm on to manage</p> <p>8 the pain that I'm in. Yeah.</p> <p>9 Q. But it's not related to that time</p> <p>10 period?</p> <p>11 A. Not the time but it's the medication</p> <p>12 that --</p> <p>13 Q. All right.</p> <p>14 A. -- was prescribed starting that time</p> <p>15 period for my foot, managing the pain in my foot.</p> <p>16 Q. Okay. Mr. Maleeah, when you arrived at</p> <p>17 Memorial Hospital on the 26th, it was in the evening;</p> <p>18 correct?</p> <p>19 A. Yes.</p> <p>20 Q. How long were you there before they</p> <p>21 started the surgery; do you recall? All right. Can</p> <p>22 you remember?</p> <p>23 (Discussion ensued off the record.)</p> <p>24 Q. (By Mr. Pontrelli) I think my question</p> <p>25 was how many hours past between your admission to</p>	<p style="text-align: right;">Page 88</p> <p>1 it, but I want to make sure we covered it all.</p> <p>2 That's your damages, your alleged damages and</p> <p>3 condition of your foot now, et cetera. So let's talk</p> <p>4 about, I heard something about one of the complaints</p> <p>5 said it affected your balance in walking. I assume</p> <p>6 running as well; correct?</p> <p>7 A. I can't run at all.</p> <p>8 Q. Okay. Percentagewise, how -- where is</p> <p>9 your balance compared to today compared to what it</p> <p>10 was before? So if your balance before was 100</p> <p>11 percent, how close are you to that now</p> <p>12 percentagewise?</p> <p>13 A. Well, my balance has only been</p> <p>14 compromised when I go this way, so this way is not</p> <p>15 affected at all to the right.</p> <p>16 Q. So --</p> <p>17 A. To the left is affected not to the</p> <p>18 right.</p> <p>19 Q. Okay.</p> <p>20 A. Because my right foot is good so when it</p> <p>21 turns around, I turn fine but when I turn to the left</p> <p>22 is when I have problems with my balance. It's gotten</p> <p>23 better but it's still not right. I still stumble, I</p> <p>24 still fall on occasion. I'll fall into the wall</p> <p>25 sometimes if I'm not careful, so but it's, like I</p>
<p style="text-align: right;">Page 87</p> <p>1 Memorial Hospital on the 26th and when they started</p> <p>2 the surgical procedure?</p> <p>3 A. The concept of time is, I mean, it was a</p> <p>4 guess, it's a guess because I don't know. They did a</p> <p>5 lot of stuff. They did a lot of work, a lot of</p> <p>6 tests, a lot of waiting. I know that the initial</p> <p>7 test took, seemed like forever to get everything done</p> <p>8 so it was hours later.</p> <p>9 Q. Do you recall at any point in time</p> <p>10 between admission to Memorial Hospital and when they</p> <p>11 started the procedure? You know, you were aware that</p> <p>12 they were going to perform surgery that you were</p> <p>13 frustrated with them and you brought it to their</p> <p>14 attention that your foot condition was more serious</p> <p>15 than they had even observed?</p> <p>16 A. No.</p> <p>17 Q. Okay.</p> <p>18 A. That happened?</p> <p>19 Q. I'm asking the questions. So you don't</p> <p>20 recall at any point in time saying --</p> <p>21 A. No.</p> <p>22 Q. -- to some staff member?</p> <p>23 A. No.</p> <p>24 Q. All right. We're almost finished. And</p> <p>25 you've throughout your deposition you've talked about</p>	<p style="text-align: right;">Page 89</p> <p>1 said, it's gotten better but it's not going to ever</p> <p>2 be 100 percent. Dr. Awe told me that.</p> <p>3 Q. How long after your surgery were you</p> <p>4 able to start walking again?</p> <p>5 A. I got back from Memorial from being in</p> <p>6 there a week. I went into infirmary for two months,</p> <p>7 two-and-a-half months, something like that while the</p> <p>8 wound closed. I could get up and walk start</p> <p>9 distances in there dragging all my stuff with me.</p> <p>10 The pumps and the wound vac thing that had to be</p> <p>11 attached to my foot two and-a-half months.</p> <p>12 When the wound closed, they allowed me</p> <p>13 to return to the dorm and I was in a wheelchair for</p> <p>14 about another month, two-and-a-half months doing</p> <p>15 short distances walking ten, 20 feet before it</p> <p>16 throbbing and stinging too bad they had to stop. So</p> <p>17 then they tried physical therapy for a very short</p> <p>18 period of time and that made it worse.</p> <p>19 So the nerves just Dr. Awe explained to</p> <p>20 me what whenever you cut through the skin, nerves get</p> <p>21 damaged and there is nothing you could do to stop it</p> <p>22 because when I asked him about this toe he cut off</p> <p>23 and I was dead serious and I still am dead serious</p> <p>24 about this toe even though my balance but this</p> <p>25 bothers me tremendously and I even asked him what's</p>

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<p style="text-align: right;">Page 90</p> <p>1 the chances of having it removed and his response is 2 if we're going to cut more and you could get damaged 3 even further. Whenever you're cut, nerves get 4 damaged so...</p> <p>5 Q. So this was referring to what would 6 have been the middle of -- middle toe of five toe 7 foot?</p> <p>8 A. Yep.</p> <p>9 Q. As he's requested that to be removed as 10 well because the pain; is that right?</p> <p>11 A. Yeah.</p> <p>12 Q. Okay.</p> <p>13 A. It's almost like it got killed but it's 14 still on my body. I mean, it's greatly affected.</p> <p>15 Q. What is your daily talking about today, 16 May 2019, what's your on a scale of one to ten what's 17 your daily pain level?</p> <p>18 A. It depends on what I'm doing. If I'm 19 out walking and moving around a lot, it's every 20 to 20 30 yards I get in bee sting in my foot but, I mean, 21 I'm used to it now. I mean, it's still painful and 22 they give me Neurontin is to dull the nerve pain but 23 it's not enough to stop it. So the other part like 24 going on the ladder when I fell off the ladder when I 25 was turning left trying to hold up this light and had</p>	<p style="text-align: right;">Page 92</p> <p>1 point; right? If it hadn't have done that, like I 2 said, we wouldn't be sitting here right now because 3 I'm not the guy that complains about every little 4 thing that pops up in my life.</p> <p>5 Q. How long have you been in prison for 6 this?</p> <p>7 A. Since 2013.</p> <p>8 Q. And were you --</p> <p>9 A. January 25th.</p> <p>10 Q. And was that your first time in prison?</p> <p>11 A. Uh-huh.</p> <p>12 Q. Okay. What medicine --</p> <p>13 A. To be honest, you know what I'm here 14 for? I'm here because I inappropriately touched 15 somebody. That's it.</p> <p>16 Q. What medications are you currently 17 taking?</p> <p>18 A. Neurontin, Lisinopril and CTM, they are 19 called CTMs. I don't even know what they are -- they 20 are for nasal allergies.</p> <p>21 Q. All right. That's not related to --</p> <p>22 A. My foot is just Neurontin.</p> <p>23 Q. And what has -- has Dr. Awe told you 24 what you should expect for how long you'll need to 25 take that medicine?</p>
<p style="text-align: right;">Page 91</p> <p>1 to put weight down on my foot, it just wasn't having 2 it and I went to the to the floor with the 60 pound 3 light in my hand, hit the floor and tore my meniscus.</p> <p>4 I'm a pretty good electrician and I 5 learned all this stuff in prison, right, since I've 6 been locked up and I like to stay busy. I don't want 7 to be like this. I don't want to be hand kept. I 8 don't want to be the guy that's in the wheelchair.</p> <p>9 That's why I took the wheelchair back 10 and gave it back to them. They didn't tell me to 11 bring it back, I took it back and gave it back to 12 Dr. Awe because I wanted him to release me so I could 13 go back to work to be back on maintenance. That's 14 how I do my time.</p> <p>15 That's how I keep this busy, my brain 16 focused. I'm good at math. I tutored in education 17 for math for a long time because I'm good at it and I 18 like to be on my feet but it's bothering me. And on 19 the street I sold cars for a living, new cars and 20 you're constantly back and forth all over that 21 dealership to be good at it to get the customers and 22 get the numbers that, you know, you need. You got to 23 be moving and so that's going to be greatly affected.</p> <p>24 So, you know, that's why I'm upset about 25 it, Mr. Pontrelli, because it affected me to that</p>	<p style="text-align: right;">Page 93</p> <p>1 A. For life.</p> <p>2 Q. Okay.</p> <p>3 A. He even tried, like I said, he's tried 4 other medicines but they didn't work. He sent me to 5 Augusta to get approved for this stuff called Lirica 6 and he said it's expensive and it did nothing. I 7 mean, Neurontin works, the Lirica did nothing so we 8 backed up off of that one.</p> <p>9 Q. But he's told you in his opinion that 10 your foot has recovered as much as it ever will?</p> <p>11 A. Yep. I have phantom pain, too, but 12 that's my brain telling me my foot still there 13 because he said it's common. But it doesn't stop. I 14 mean, my toe feels like it's still there but it's not 15 there, obviously.</p> <p>16 Q. Have you been making plans for what 17 sort of employment or job that you're going to look 18 to when you get out and you're able to?</p> <p>19 A. I mean, I'd like to try to stay in the 20 car business but I'm going to be affected by it. I 21 mean, I'm not going to be able to do what I was able 22 to do before but I'll find something in it. You 23 know, I'm not going to sit down. I'm not like that.</p> <p>24 Q. Okay. So --</p> <p>25 A. I'm not going to go draw a check and go</p>

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<p style="text-align: right;">Page 94</p> <p>1 hide in a box. I want to stay busy and go to work.</p> <p>2 Q. Is there anything that you could think</p> <p>3 of today that you haven't described for us about your</p> <p>4 physical pain and why don't you --</p> <p>5 A. Huh-uh.</p> <p>6 MS. SMITH: Is that a no?</p> <p>7 THE WITNESS: No, ma'am.</p> <p>8 Q. (By Mr. Pontrelli) Last question would</p> <p>9 be just tell me in your words how this whole</p> <p>10 experience has affected you emotionally or mentally?</p> <p>11 A. It's been at times overwhelming because</p> <p>12 of the lack of care will be the right way to say it.</p> <p>13 I'm in a place where I'm held against my will right</p> <p>14 now. I don't have choices of doctors that I can go</p> <p>15 to. This is where I go and if you can see what I've</p> <p>16 seen, the treatment that we receive, the way they</p> <p>17 speak to us, the way they talk to us, the disrespect</p> <p>18 and the treatment that I didn't get here.</p> <p>19 Going back to the dorm at night with my</p> <p>20 foot hurting and they acted like they didn't even</p> <p>21 care and my foot got worse and worse and worse and</p> <p>22 finally and it wasn't on the actions of the prison</p> <p>23 that got me to Memorial it was me falling out, being</p> <p>24 told that by a veteran inmate who knew how to get to</p> <p>25 get to a real doctor at a real hospital. If I</p>	<p style="text-align: right;">Page 96</p> <p>1 A. Yeah. It affects me everyday.</p> <p>2 Q. What about sleep, is your sleep --</p> <p>3 A. It affects me with sleep. I wake up two</p> <p>4 or 3:00 in the morning everyday.</p> <p>5 Q. Is that apart just from the fact that</p> <p>6 you're in a prison --</p> <p>7 A. No.</p> <p>8 Q. -- environment?</p> <p>9 A. No. I've because gotten used to that</p> <p>10 and I wear earplugs. I mean, I do what -- I've</p> <p>11 learned to do that; all right? When it wakes me up</p> <p>12 at 2:00 or 3:00 in the morning or if I roll over and</p> <p>13 the top of my foot touches the mattress, instantly</p> <p>14 awake.</p> <p>15 The top of my foot doesn't like to be</p> <p>16 touched at all but -- but and I -- you know, like I</p> <p>17 said, what else can I do about it? I can't do</p> <p>18 anything about it right now so that's -- this is what</p> <p>19 I deal with in here; all right?</p> <p>20 And, listen, Friday, this last Friday, N</p> <p>21 building, right in N building, the entire building</p> <p>22 didn't get called out to pill call and I filed a</p> <p>23 grievance on it. We all missed pill call Friday</p> <p>24 morning and it was because the officers that were</p> <p>25 running it errored and didn't realize the building</p>
<p style="text-align: right;">Page 95</p> <p>1 wouldn't have done that, God only knows what the</p> <p>2 plans were going to be here but I was already -- my</p> <p>3 foot was dying and I was sent back to the dorm.</p> <p>4 You know, and listen, I've seen two</p> <p>5 more inmates die here from infection since this</p> <p>6 happened, from infection. You shouldn't die in</p> <p>7 prison from infection. They should be able to treat</p> <p>8 us and, you know, in my grievance I even put in there</p> <p>9 that some of the changes I'd like to see if someone</p> <p>10 comes in with a serious infection, that they do</p> <p>11 tests, they do blood work and they get you on the</p> <p>12 right amount of medication they need to fight it back</p> <p>13 so they can win.</p> <p>14 Q. So it's your testimony that no blood</p> <p>15 work or testing was down on you --</p> <p>16 A. No.</p> <p>17 Q. -- before you went to the Memorial</p> <p>18 Hospital?</p> <p>19 A. No. No. They -- Ms. Jackson did a swab</p> <p>20 the night that I went to the emergency room but by</p> <p>21 that time I'm already on my way out the door but</p> <p>22 that's the only test that was ever done on me.</p> <p>23 Q. What about today, May 2019, has this --</p> <p>24 that, you know, your foot, your experience with your</p> <p>25 foot has that affected you anxietywise?</p>	<p style="text-align: right;">Page 97</p> <p>1 had not been called and then by the time they figured</p> <p>2 it out, it was too late. So those guys didn't get</p> <p>3 any pain medication just in the morning and if they</p> <p>4 don't get it in the morning, they can't go back at</p> <p>5 noon to get it, it's not until the next day.</p> <p>6 Q. So remind me so what is -- the only</p> <p>7 medicine you're taking for pain is Neurontin?</p> <p>8 A. Motrin.</p> <p>9 Q. And Motrin. And how much Motrin,</p> <p>10 milligrams of Motrin do you take per day?</p> <p>11 A. 800. I get two in the morning and two</p> <p>12 at night so that's a lot. That's 16, 32, 4,800.</p> <p>13 MR. PONTRELLI: I don't have any other</p> <p>14 questions for you. I'm sure Ms. Smith has a few.</p> <p>15 EXAMINATION</p> <p>16 BY MS. SMITH:</p> <p>17 Q. Yeah. Mr. Maleeah, my name is Nikki</p> <p>18 Smith I represent Dr. Brown. I'm going to kind of</p> <p>19 jump around because --</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. -- he's covered a lot different things</p> <p>22 so forgive me and if don't understand my questions,</p> <p>23 wait until I'm done asking it --</p> <p>24 A. Okay.</p> <p>25 Q. -- and then ask me to repeat it and</p>

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<p style="text-align: right;">Page 98</p> <p>1 I'll try to do so; okay?</p> <p>2 A. All right.</p> <p>3 Q. If you answer the question that I pose</p> <p>4 without telling me you don't understand it, I'm going</p> <p>5 to assume that you understood it; is that fair?</p> <p>6 A. Yes, ma'am.</p> <p>7 Q. All right. And kind of like the way</p> <p>8 the same way that you were doing with Mr. Pontrelli,</p> <p>9 if you will let me ask my question and then I'll let</p> <p>10 you answer and we'll try not to interrupt each other;</p> <p>11 all right?</p> <p>12 A. Okay.</p> <p>13 Q. Based on what you have told us today</p> <p>14 you explained that you were transferred from Coastal</p> <p>15 State Prison on May 26th, 2016 to Memorial Hospital</p> <p>16 ER?</p> <p>17 A. Yes, ma'am.</p> <p>18 Q. Okay. And that was to treat the</p> <p>19 infection in your foot?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. In the days leading up to your transfer</p> <p>22 to Memorial Hospital from May 22nd, 2016 to May 26,</p> <p>23 2016 you never saw Dr. Brown during that time period?</p> <p>24 A. No, ma'am.</p> <p>25 Q. Okay. And that's because Dr. Brown</p>	<p style="text-align: right;">Page 100</p> <p>1 Q. What day was that?</p> <p>2 A. Oh, the day. I can't remember the day</p> <p>3 but I can tell you it was in the infirmary.</p> <p>4 Q. Okay.</p> <p>5 A. She was making rounds with the PA,</p> <p>6 Ms Darcy.</p> <p>7 Q. Hold on. Let me stop you right there.</p> <p>8 A. Okay.</p> <p>9 Q. That would have been when you were</p> <p>10 still in the recovery period?</p> <p>11 A. Yes, ma'am.</p> <p>12 Q. And at this point you've had your</p> <p>13 surgery, you're in that time period when you</p> <p>14 described earlier that you were in the infirmary for</p> <p>15 about a month while your wound was healing?</p> <p>16 A. About two months, two-and-a-half months.</p> <p>17 Q. So that would have been July or July of</p> <p>18 2016?</p> <p>19 A. Yes.</p> <p>20 Q. All right. And I want to ask you about</p> <p>21 that because you in your complaint on -- and do you</p> <p>22 have a copy I think it's Exhibit 3? Mr. Maleeah, I</p> <p>23 want to refer you to your complaint paragraph 26.</p> <p>24 A. What page?</p> <p>25 Q. I think it's 18 of 22 of the first</p>
<p style="text-align: right;">Page 99</p> <p>1 didn't work here?</p> <p>2 A. Work in here, yes, ma'am.</p> <p>3 Q. The times that you are asking to see a</p> <p>4 physician during that time period, May 22, 2016 to</p> <p>5 the time you went to the hospital on the 26th, you</p> <p>6 wanted to see Dr. Awe.</p> <p>7 A. Yes, ma'am.</p> <p>8 Q. Prior to May 26th, 2016 you had never</p> <p>9 met Dr. Brown?</p> <p>10 A. No, ma'am.</p> <p>11 Q. Prior to going to Memorial on May 26th,</p> <p>12 2016 you had never spoken to Dr. Brown?</p> <p>13 A. No, ma'am.</p> <p>14 Q. The first timing that you met Dr. Brown</p> <p>15 was after your surgery at Memorial and after you had</p> <p>16 been discharged back to Coastal State Prison?</p> <p>17 A. Yes, ma'am.</p> <p>18 Q. And that was after your foot surgery?</p> <p>19 A. After surgery, yes, ma'am.</p> <p>20 Q. Okay. And that was after the infection</p> <p>21 in your leg had cleared up?</p> <p>22 A. Yes, ma'am.</p> <p>23 Q. Do you remember the first time that you</p> <p>24 saw her?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 101</p> <p>1 section of it.</p> <p>2 A. Okay. And which paragraph?</p> <p>3 Q. Paragraph 26.</p> <p>4 A. Yes, ma'am.</p> <p>5 Q. It starts after a week I was released</p> <p>6 from Memorial Hospital.</p> <p>7 A. Yes.</p> <p>8 Q. So you're right there. And this is</p> <p>9 made up of two paragraphs this number 26.</p> <p>10 A. Yes.</p> <p>11 Q. So when you go to the following page --</p> <p>12 A. Okay.</p> <p>13 Q. -- it says the PA, Ms Darcy, had to</p> <p>14 make rounds with the new doctor?</p> <p>15 A. Yes.</p> <p>16 Q. Dr. Brown?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And so this would have been the</p> <p>19 first time you met Dr. Brown?</p> <p>20 A. That's when I met her.</p> <p>21 Q. And when you say PA Darcy, we know</p> <p>22 really now you're now talking about PA Dorsey?</p> <p>23 A. Dorsey, yes, ma'am.</p> <p>24 Q. And the next sentence of that paragraph</p> <p>25 says she overly nice to me as she and the new doctor</p>

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<p>1 came into my infirmary cell.</p> <p>2 A. Yes.</p> <p>3 Q. The she that you're referring to PA</p> <p>4 Dorsey?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. All right. You\ referring to</p> <p>7 Dr. Brown?</p> <p>8 A. No, ma'am.</p> <p>9 Q. And tell me about that interaction with</p> <p>10 you and Dr. Brown that first time that you met her?</p> <p>11 A. I liked Dr. Brown. You could tell that</p> <p>12 she was a good doctor. She would come in with</p> <p>13 Ms. Darcy while my dressings were being changed and</p> <p>14 she wanted to see how my foot was progressing.</p> <p>15 Q. Okay.</p> <p>16 A. And that's when she introduced herself</p> <p>17 to me and so you could tell, I mean, she got right</p> <p>18 down in there and looked, boy and she was looking in</p> <p>19 the cracks and checking it and picking my foot up,</p> <p>20 you know, doing what you think she should be doing</p> <p>21 and she got me straight for the day.</p> <p>22 Q. Okay. So she touched you and examined</p> <p>23 you?</p> <p>24 A. Oh, yeah. She looked at my foot and</p> <p>25 examined the foot.</p>	<p>1 Q. And did you need any treatment from her</p> <p>2 at that moment?</p> <p>3 A. I was getting all I could get.</p> <p>4 Q. At then at some point you described to</p> <p>5 us you've been discharged and you're able to go back</p> <p>6 to your cell and you've told us already about that?</p> <p>7 A. Yes.</p> <p>8 Q. When is the next time you interacted</p> <p>9 with Dr. Brown?</p> <p>10 A. I put in a sick call to see Dr. Awe and</p> <p>11 because Dr. Awe was the one taking care of my foot</p> <p>12 when I came back --</p> <p>13 Q. Okay?</p> <p>14 A. -- I didn't see even Ms. Darcy anymore</p> <p>15 after that, so I figured Dr. Awe took over and I was</p> <p>16 happy about that; right? So I get a call out and</p> <p>17 when I get down there, it was I was all of a sudden</p> <p>18 seeing Dr. Brown. I didn't have a problem with it, I</p> <p>19 mean, it's just she didn't know anything about really</p> <p>20 what had transpired up to that point.</p> <p>21 Q. Okay.</p> <p>22 A. And so I felt that I should have been</p> <p>23 seeing Dr. Brown or Dr. Awe.</p> <p>24 Q. Okay.</p> <p>25 A. But, anyways, Dr. Brown almost the way I</p>
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<p>1 Q. In the last sentence of that paragraph</p> <p>2 I believe her intent was to cause me harm. The her</p> <p>3 you're referring to is PA Dorsey?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. I just wanted to make sure we</p> <p>6 weren't talking about Dr. Brown.</p> <p>7 A. Yes.</p> <p>8 Q. Yes, we are not talking about Dr.</p> <p>9 Brown?</p> <p>10 A. We are not talking about Dr. Brown.</p> <p>11 Q. Thank you, sir. And you can hand that</p> <p>12 back to her, or actually hold on to it for a second.</p> <p>13 So in the time period that you were in the two month</p> <p>14 recovery period in the infirmary within the prison</p> <p>15 would you intermittently see Dr. Brown during that</p> <p>16 time period?</p> <p>17 A. Just in passing. That was the only time</p> <p>18 I saw her.</p> <p>19 Q. Okay. That one time?</p> <p>20 A. That one time.</p> <p>21 Q. And that one time she examined you and</p> <p>22 saw how your wound was progressing?</p> <p>23 A. Yes.</p> <p>24 Q. And did you ask her for any treatment?</p> <p>25 A. No.</p>	<p>1 read it was Dr. Awe asked Dr. Brown to see me because</p> <p>2 it wasn't anything more they could do for my foot and</p> <p>3 he put her in a position to tell me that. I mean,</p> <p>4 that's just what I perceived it as because when I saw</p> <p>5 her, it was to get my meds refilled, see if I could</p> <p>6 have -- what other options were available on my foot</p> <p>7 and she said that there wasn't anything that they</p> <p>8 could do. What I had -- what's happened has</p> <p>9 happened, what hurts hurts, she can renew my meds but</p> <p>10 that would be hit.</p> <p>11 Q. Let me -- and then so would that have</p> <p>12 been the November 3rd, 2016 visit?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. So the two times that you have</p> <p>15 interacted with Dr. Brown been sometime in July of</p> <p>16 2016 --</p> <p>17 A. June probably.</p> <p>18 Q. June of 2016 and then this one time</p> <p>19 when you actually had a sick visit on November 3rd,</p> <p>20 2016?</p> <p>21 A. Yep. Just to get meds refilled and to</p> <p>22 see if there were other options available on my foot.</p> <p>23 Q. Okay. And she saw you at that office</p> <p>24 visit?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 106</p> <p>1 Q. And she listened to your complaints?</p> <p>2 Yes?</p> <p>3 A. Yes. Yes.</p> <p>4 Q. And she listened with you when you said</p> <p>5 what was wrong with you?</p> <p>6 A. Yes.</p> <p>7 Q. And she went over your medications with</p> <p>8 you?</p> <p>9 A. Yes.</p> <p>10 Q. She examined your foot?</p> <p>11 A. Not like but she really didn't need to</p> <p>12 because it was closed up. There wasn't really</p> <p>13 anything to examine. I mean, it was my foot. It is</p> <p>14 what it is. It was closed so there was no wound.</p> <p>15 Q. Okay.</p> <p>16 A. All right.</p> <p>17 Q. You asked her if you could -- you asked</p> <p>18 her about could you have that toe removed or even</p> <p>19 have your foot amputated. Do you recall that?</p> <p>20 A. The toe.</p> <p>21 Q. The toe. Okay.</p> <p>22 A. Yeah. Because it was, like I said, it</p> <p>23 was -- have you ever sat indian style too long and</p> <p>24 you get up and your legs tingle and sting? That's</p> <p>25 what that toe feels like nonstop.</p>	<p style="text-align: right;">Page 108</p> <p>1 Q. And then I suppose all your other --</p> <p>2 you take Lisinopril for blood pressure?</p> <p>3 A. Blood pressure.</p> <p>4 Q. And then your other medication she</p> <p>5 would have refilled that as well?</p> <p>6 A. Yes.</p> <p>7 Q. All right. Did she tell you</p> <p>8 Mr. Maleeah don't come back here again?</p> <p>9 A. She told me that there wasn't anything</p> <p>10 more they could do for me when it came to my foot.</p> <p>11 Q. Okay.</p> <p>12 A. So it made me feel like -- and what</p> <p>13 bothered was that she hadn't been involved; right? I</p> <p>14 know she had my chart sitting there --</p> <p>15 Q. Uh-huh.</p> <p>16 A. -- and it's not that I had any problems</p> <p>17 with here because I didn't. I admired here when she</p> <p>18 came in that first time she, you could tell she was a</p> <p>19 doctor the way she carried herself; right? So but</p> <p>20 what bothered me was she didn't know a whole lot</p> <p>21 about the case of what happened that's gotten me to</p> <p>22 this point; right?</p> <p>23 Q. Okay.</p> <p>24 A. And she's coming in and I'm asking her</p> <p>25 can you help me get beyond where I'm at right now.</p>
<p style="text-align: right;">Page 107</p> <p>1 Q. Pins and needles?</p> <p>2 A. Pins and needles. Thank you.</p> <p>3 Q. And so you told her about this?</p> <p>4 A. Yeah.</p> <p>5 Q. She listened?</p> <p>6 A. Yeah.</p> <p>7 Q. She said, unfortunately, amputation of</p> <p>8 your other toe is not going to solve that problem?</p> <p>9 A. Right. Well, When she told me about if</p> <p>10 you get cut again, you're going to have nerve damage.</p> <p>11 Every time you -- and Dr. Awe told me the same thing</p> <p>12 that you can every time your skin gets cut, there is</p> <p>13 damage to the nerves.</p> <p>14 Q. Okay.</p> <p>15 A. So --</p> <p>16 Q. So at that visit she continued the pain</p> <p>17 medication that you were on?</p> <p>18 A. She gave me that. Yeah.</p> <p>19 Q. Which was the Neurontin?</p> <p>20 A. Yea.</p> <p>21 Q. And she also --</p> <p>22 A. And Motrin.</p> <p>23 Q. I was going to say and she continued</p> <p>24 your Motrin?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 109</p> <p>1 Q. Did you have --</p> <p>2 A. And she stopped me cold right there.</p> <p>3 Q. Okay. Did you have the understanding</p> <p>4 that she had talked to Dr. Awe about your situation?</p> <p>5 A. No. But I -- well, I figured they might</p> <p>6 have had some words because --</p> <p>7 Q. Okay.</p> <p>8 A. -- I figured Dr. Awe sent me to her to</p> <p>9 kind of confirm what he's been telling me. They</p> <p>10 can't do anything for me.</p> <p>11 Q. So Dr. Awe at this point had already</p> <p>12 told you there are no other options for your nerve</p> <p>13 pain?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And so in a sense Dr. Brown was</p> <p>16 a second opinion?</p> <p>17 A. That's the way I read it. Yeah.</p> <p>18 Q. Okay. Would you agree with me that</p> <p>19 nerve damage you suffered from is related to the foot</p> <p>20 infection that you had from May 22nd, 2016 to your</p> <p>21 surgery on May 26th?</p> <p>22 A. Absolutely all of it.</p> <p>23 Q. Okay. If the pain and the all the kind</p> <p>24 of things that you have described here what you can't</p> <p>25 do, that's related to the treatment or the lack of</p>

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<p style="text-align: right;">Page 110</p> <p>1 treatment that you received from May 22nd to May 26th</p> <p>2 at the prison?</p> <p>3 A. All of it.</p> <p>4 Q. Okay. You would agree with me that</p> <p>5 your nerve pain and your complaints, your problems</p> <p>6 with balance that is unrelated to anything that</p> <p>7 Dr. Brown did or didn't do for you?</p> <p>8 A. Yes. Unrelated.</p> <p>9 Q. Okay?</p> <p>10 A. And to be honest, I'm going to tell you</p> <p>11 straight. I didn't even really have issues with</p> <p>12 Dr. Brown, just that when I went to her that one time</p> <p>13 and she said there was nothing she could do for me,</p> <p>14 right, and I felt like she was being a puppet for</p> <p>15 Dr. Awe.</p> <p>16 Q. Okay.</p> <p>17 A. And I really didn't even want her to be</p> <p>18 in the lawsuit --</p> <p>19 Q. Okay.</p> <p>20 A. -- to be honest with you.</p> <p>21 Q. Okay.</p> <p>22 A. Right? But at the end of the day when</p> <p>23 the complaint comes to the court, I had to get all</p> <p>24 the players sitting at the table, which is what we're</p> <p>25 doing.</p>	<p style="text-align: right;">Page 112</p> <p>1 waiting to see him. When I got in there to see him,</p> <p>2 he had my file and all he said was I'm going to go</p> <p>3 ahead and approve the Lisinopril and we're going to</p> <p>4 see how that works for you, I'll see you back here in</p> <p>5 six months.</p> <p>6 Q. Did you mean Lirica?</p> <p>7 A. Lirica, yes.</p> <p>8 Q. Okay. And you've explained that Lirica</p> <p>9 did not work?</p> <p>10 A. Nothing. And then listen to this: When</p> <p>11 we go to Augusta, we're chained down. I mean, front,</p> <p>12 back, feet everything. So riding in the van chained</p> <p>13 down every six months to go for a five minute visit</p> <p>14 sitting in the hall for an hour to get something that</p> <p>15 doesn't even work. I told Dr. Awe there is no sense</p> <p>16 even sending me over there.</p> <p>17 Q. Okay.</p> <p>18 A. This guy didn't even -- His bedside</p> <p>19 manner, none.</p> <p>20 Q. Okay. So you have now since stopped</p> <p>21 the Lirica and gone back on the Neurontin?</p> <p>22 A. Neurontin. Yeah. And that was --</p> <p>23 Q. And that has gotten you some relief?</p> <p>24 A. It allows me to sleep.</p> <p>25 Q. Okay.</p>
<p style="text-align: right;">Page 111</p> <p>1 Q. What do you think she should have done</p> <p>2 differently?</p> <p>3 A. Well, see, that's just it, I'm not a</p> <p>4 doctor so I don't know what other things can be done.</p> <p>5 The toe, my toe in the situation that it is right now</p> <p>6 is not acceptable. I'm telling you something needs</p> <p>7 to be done, either that thing needs to be, a nerve</p> <p>8 found and killed or something or, like I said, I</p> <p>9 mean, being lack of medically trained, cut it off.</p> <p>10 Q. Here.</p> <p>11 A. You know what I mean? So, I'm sorry, I</p> <p>12 don't know, but something needs to be done.</p> <p>13 Q. You explained that Dr. Awe had referred</p> <p>14 you to Augusta?</p> <p>15 A. Yes. To a pain clinic.</p> <p>16 Q. Did that happen before or after this</p> <p>17 November visit with Dr. Brown?</p> <p>18 A. After.</p> <p>19 Q. Okay. When you went to Augusta, did</p> <p>20 they tell you that anything else could be done for</p> <p>21 your nerve pain other than to try to switch</p> <p>22 medications?</p> <p>23 A. No. That was one of them, he's a</p> <p>24 specialist but you can't really talk to him. I sat</p> <p>25 out there in the hall on the floor for an hour</p>	<p style="text-align: right;">Page 113</p> <p>1 A. It doesn't stop the pain but I also,</p> <p>2 like I told doctor, I don't want to get hooked on the</p> <p>3 kind of medication that's going to put me in a</p> <p>4 methadone clinic when I get out of prison. I'm not</p> <p>5 after the drugs that a lot of the guys get, the patch</p> <p>6 and that kind of stuff they are on.</p> <p>7 Q. Prior to being convicted for child</p> <p>8 molestation where did you live?</p> <p>9 A. Augusta.</p> <p>10 Q. Augusta. Okay. And how long had you</p> <p>11 lived there?</p> <p>12 A. Three-and-a-half years.</p> <p>13 Q. So you lived from 2009 to 2013?</p> <p>14 A. Yep.</p> <p>15 Q. Where did you live prior to that?</p> <p>16 A. In Montana and Idaho and Washington</p> <p>17 State.</p> <p>18 Q. Okay. Have you -- what did you do for</p> <p>19 a living?</p> <p>20 A. Car business.</p> <p>21 Q. Okay. And when you say car business,</p> <p>22 were you in car sales or car repair?</p> <p>23 A. Car sales.</p> <p>24 Q. Okay.</p> <p>25 A. Always sales.</p>

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<p style="text-align: right;">Page 114</p> <p>1 Q. Where did you work?</p> <p>2 A. At Auto Plex.</p> <p>3 Q. Okay. Is that --</p> <p>4 A. One Washington Avenue.</p> <p>5 Q. One Washington Avenue?</p> <p>6 A. One Washington Avenue, yes.</p> <p>7 Q. Is that what you also did back in</p> <p>8 Washington?</p> <p>9 A. Yes.</p> <p>10 Q. Have you ever been convicted of any</p> <p>11 other crimes?</p> <p>12 A. No. DUI.</p> <p>13 Q. Okay.</p> <p>14 A. Yeah.</p> <p>15 Q. And you've been jailed for DUI?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And how long --</p> <p>18 A. Multiple times.</p> <p>19 Q. All right. And how long were you in</p> <p>20 prison for your --</p> <p>21 A. Not prison.</p> <p>22 Q. All right.</p> <p>23 A. Just jail.</p> <p>24 Q. Just jail?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 116</p> <p>1 your skin; right?</p> <p>2 A. Yea. And I didn't have an issue, I was</p> <p>3 just one of the first guys to get the bracelet.</p> <p>4 Q. In what state were you arrested? Was</p> <p>5 it Washington?</p> <p>6 A. For DUI?</p> <p>7 Q. Yes, sir.</p> <p>8 A. Yeah.</p> <p>9 Q. Okay. And was that primarily where you</p> <p>10 were arrested and jail occurs?</p> <p>11 A. Yes.</p> <p>12 Q. All right. Have you ever had any</p> <p>13 treatment for alcohol?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And so I'm assuming you don't</p> <p>16 get alcohol in prison?</p> <p>17 A. No. But we can get it, though.</p> <p>18 Q. When is the -- I guess where did you</p> <p>19 have treatment for alcoholism?</p> <p>20 A. Washington State.</p> <p>21 Q. Okay.</p> <p>22 A. Yeah.</p> <p>23 Q. Did you ever have any arrests or</p> <p>24 difficulties with alcohol when you lived in Augusta?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 115</p> <p>1 Q. How many conviction for DUI do you</p> <p>2 have?</p> <p>3 A. Five.</p> <p>4 Q. Okay. Because I think I saw an article</p> <p>5 where you had a bracelet that was supposed to monitor</p> <p>6 and that's the way that maybe on the fifth or the</p> <p>7 fourth time they monitored your skin?</p> <p>8 A. They do the -- oh, no. No. They</p> <p>9 don't -- I don't think I ever had an issue with that.</p> <p>10 I know that you're talking about wearing the</p> <p>11 bracelet.</p> <p>12 Q. Uh-huh.</p> <p>13 A. They never -- they never -- I never had</p> <p>14 an issue with the bracelet.</p> <p>15 Q. Where were your convictions?</p> <p>16 A. Oh, oh, I know what you're talking</p> <p>17 about. I was one of the first guys to wear that</p> <p>18 bracelet.</p> <p>19 Q. Okay.</p> <p>20 A. And the reason that there were putting</p> <p>21 it on I was like a test pilot; right?</p> <p>22 Q. Uh-huh.</p> <p>23 A. It would just deter people with problems</p> <p>24 with drinking because they will know you're drinking.</p> <p>25 Q. Right. It's to measure the alcohol in</p>	<p style="text-align: right;">Page 117</p> <p>1 Q. Okay. Were you ever arrested for</p> <p>2 anything in Augusta?</p> <p>3 A. No.</p> <p>4 Q. All right.</p> <p>5 A. No. I pretty much left the drinking</p> <p>6 thing behind. I had my butt kicked pretty bad by</p> <p>7 that stuff and that's what's actually causing the</p> <p>8 issue for me being in here now is getting too drunk</p> <p>9 one night being stupid and, anyway.</p> <p>10 Q. Throughout your deposition earlier</p> <p>11 today you were looking at a variety of documents and</p> <p>12 would it be fair to say that the documents you were</p> <p>13 looking at were your handwritten notes having to do</p> <p>14 with the complaint?</p> <p>15 A. Yes.</p> <p>16 Q. And all of the affidavits that your</p> <p>17 fellow inmates filed on your behalf?</p> <p>18 A. Yes.</p> <p>19 Q. When you saw Dr. Brown in November of</p> <p>20 2016, did you ask her for a referral to another</p> <p>21 physician?</p> <p>22 A. No.</p> <p>23 Q. Okay. Did you ask her for any other</p> <p>24 kind of medications?</p> <p>25 A. I asked her what other options were</p>

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<p style="text-align: right;">Page 118</p> <p>1 available, what can we do.</p> <p>2 Q. Okay.</p> <p>3 A. Because here is where we are now. I</p> <p>4 want to try to get here and she said that where I'm</p> <p>5 at is where I'm at. There is nothing more they</p> <p>6 can do for me.</p> <p>7 Q. Okay.</p> <p>8 A. I was looking to see -- I was looking to</p> <p>9 see -- I was looking for this all to stop. I wanted</p> <p>10 it to be where is the end of the road going to be for</p> <p>11 me and I found out I was already there. That was it.</p> <p>12 Q. It's a permanent condition?</p> <p>13 A. It's a permanent condition and I didn't</p> <p>14 like hearing it.</p> <p>15 Q. And when you did treat with her, she</p> <p>16 did offer you medication and you filled it and</p> <p>17 continued to take it?</p> <p>18 A. She refilled my medication, yes.</p> <p>19 Q. Okay. The grievance that you filed</p> <p>20 about that November 2016 visit with Dr. Brown, you</p> <p>21 did not receive a reply to it?</p> <p>22 A. No.</p> <p>23 Q. You don't know whether or not it went</p> <p>24 through the grievance process?</p> <p>25 A. No. But I know it was given to</p>	<p style="text-align: right;">Page 120</p> <p>1 MS. SMITH: Okay. I think that's all I</p> <p>2 have.</p> <p>3 FURTHER EXAMINATION</p> <p>4 BY MR. PONTRELLI:</p> <p>5 Q. Yes. I'm almost finished. All right.</p> <p>6 Mr. Pontrelli, I'm going to ask you about one</p> <p>7 paragraph or a couple but paragraph 26 in the</p> <p>8 complaint you handed it back but it's the one where</p> <p>9 you said, quote, I believe her, Ms Darcy, intent was</p> <p>10 to cause me harm.</p> <p>11 A. Yes.</p> <p>12 Q. That's what -- okay. You're not</p> <p>13 referring to that visit at the infirmary?</p> <p>14 A. No. No. No.</p> <p>15 Q. You mean back --</p> <p>16 A. Back when she was treating my foot.</p> <p>17 Q. Okay. So my question to you, tell me</p> <p>18 every fact of which you're aware that supports that</p> <p>19 belief that Ms. Darcy intended to pardon you?</p> <p>20 A. Because she didn't do anything for my</p> <p>21 foot. My foot was so grotesque looking that it would</p> <p>22 shock you. It shocked everybody else that saw it.</p> <p>23 They couldn't even believe that, you know, in the</p> <p>24 dorm that they kept sending me back. It was crazily</p> <p>25 huge the deputy warden who is now the warden at</p>
<p style="text-align: right;">Page 119</p> <p>1 Ms. Rivers.</p> <p>2 Q. Okay?</p> <p>3 A. Because the counselor that I gave it to</p> <p>4 tore the bottom of it off and gave me my receipt; all</p> <p>5 right?</p> <p>6 Q. And do you still have that?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. When did you fill out the</p> <p>9 grievance for your visit with Dr. Brown?</p> <p>10 A. I don't remember what -- it would have</p> <p>11 been -- it would have been right close within that</p> <p>12 same day or the next day.</p> <p>13 Q. Okay.</p> <p>14 A. Because you have five days I think it is</p> <p>15 to finish it.</p> <p>16 Q. When you get the response from</p> <p>17 Ms. Rivers or from anyone, what is your next -- what</p> <p>18 did you do then?</p> <p>19 A. Wrote Ms. Rivers a note.</p> <p>20 Q. Okay. And did you keep a copy of that</p> <p>21 note?</p> <p>22 A. Yes.</p> <p>23 Q. Okay.</p> <p>24 A. There are a couple of them already in</p> <p>25 there.</p>	<p style="text-align: right;">Page 121</p> <p>1 Telfair, Mr. Brookes, stopped him in his tracks.</p> <p>2 He was on his phone, he was walking</p> <p>3 through medical, I'm sitting back there with my foot</p> <p>4 upon the bench and it stopped him. He put the phone</p> <p>5 down and said, Maleeah, what happened to your foot.</p> <p>6 It was that bad.</p> <p>7 So I would go there, she acted</p> <p>8 unconcerned. The streaks didn't mean nothing to her,</p> <p>9 didn't slow her down in one way, shape or form. She</p> <p>10 sent me back to the dorm the night that I fell out</p> <p>11 and got to the hospital. When I got there, the</p> <p>12 doctor is telling me that my infection is killing me,</p> <p>13 it's killing my leg. It was necrotizing, his words,</p> <p>14 and her treatment was putting me back in the dorm</p> <p>15 that night.</p> <p>16 So why is that big difference there? I</p> <p>17 mean, was it acceptable to her that my leg was dying?</p> <p>18 She didn't even know because she didn't do any tests.</p> <p>19 She was didn't know what was going on with my leg,</p> <p>20 she glanced at it. The only test that was done was</p> <p>21 when I left that night Nurse Jackson got a swab.</p> <p>22 Q. By night you mean the 26th before you</p> <p>23 went to Memorial Hospital; right?</p> <p>24 A. Yes.</p> <p>25 Q. Did Ms. -- during that time period of</p>

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<p style="text-align: right;">Page 122</p> <p>1 May 22nd, 2016 through May 26, 2016 I think you saw 2 Dorsey on the 23rd, 25th, 26th, did she ever verbally 3 say anything to you, which leads you to believe that 4 she had caused you harm? 5 A. No. 6 Q. Okay. So your belief is based entirely 7 on the fact of her what you consider improper, 8 insufficient treatment she didn't do what she was 9 supposed to do, didn't care, is that -- would you go 10 that for to see? 11 A. Yeah. Didn't care, lack of treatment, 12 lack of tests, lack of, you know, being a medical 13 professional, I mean, if you have -- like look at the 14 difference. When I got to Memorial, I was surrounded 15 by several people all going in different directions, 16 doing different things and the doctor is barking off 17 orders and their nurses going in and out and doing 18 tests and swabs and blood work and a machine come in, 19 went all way around my leg and, I mean, they were 20 doing all these -- none of that was done of here. 21 None of it was done here. And then 22 after that they are calling in a physician who is 23 going to cut on me. I mean, to be told that, I 24 thought that, listen, when I got there, I was hoping 25 that they were going to put me on some IV</p>	<p style="text-align: right;">Page 124</p> <p>1 FURTHER EXAMINATION 2 BY MS. SMITH: 3 Q. Who took the photographs that you have? 4 A. I don't even know. They just came in 5 and took them, I signed papers for it. They said I 6 had agreed to it and I signed it and I was medicated. 7 When I woke up, they were there. I asked for them, 8 though. 9 Q. Was it at Memorial Hospital? 10 A. Yes. 11 MS. SMITH: Okay. 12 MR. PONTRELLI: Thank you, Mr. Maleeah. 13 I appreciate it. Oh, is there anything in that 14 stack that you, other than the two original 15 pictures that you think we haven't seen, not like 16 your own plans for the case and that kind of stuff 17 but like -- 18 THE WITNESS: No all of it is. 19 MR. PONTRELLI: -- evidence that you 20 would use at trial? 21 THE WITNESS: No. It's just mail back 22 and forth and stuff so... 23 MS. SMITH: We'll just allow him to 24 remain under oath until he gets a copy of the 25 deposition and then can sign. Mr. Maleeah.</p>
<p style="text-align: right;">Page 123</p> <p>1 antibiotics, get something in me strong to fight this 2 thing back, get it out of the way, then let me go 3 back to the prison. I'm good with that. 4 But when the doctor said I needed to see 5 a vascular surgeon, he was going to have cut on me; 6 right? I mean, that got real that hurry. And when 7 he said that I'm probably going to lose my foot, I 8 couldn't believe it. He squeezed my foot and the 9 green squirted out at the top of my foot like a 10 volcano and went on to his hands and he set my foot 11 back down. It was that bad. 12 Q. Okay. Part of that answer is 13 nonresponsive but you've already said it, so you've 14 already testified on that so it's not like I'm not 15 preventing you from saying that, you're just stating 16 again it wasn't really like what was the question. 17 A. It was traumatic. 18 MR. PONTRELLI: That's why I'm saying 19 it, though. I understand. Just putting that on 20 the record. I hear you. All right. Thank you 21 very -- 22 THE WITNESS: I just wanted you to see 23 what I saw, you know, while I was there. That's 24 all. 25</p>	<p style="text-align: right;">Page 125</p> <p>1 THE WITNESS: Yes. 2 MS. SMITH: So when this deposition is 3 done, she's going to send you a copy of the 4 testimony. 5 THE WITNESS: Okay. 6 MS. SMITH: You have the opportunity to 7 review it, read it and sign it, affirm that this 8 is your testimony. 9 THE WITNESS: Okay. 10 MS. SMITH: And we're just going to 11 agree to allow you to do that without having a 12 notary. 13 THE WITNESS: Okay. 14 MR. PONTRELLI: So there will be a sheet 15 where you can make any changes and give the reason 16 for why it is -- 17 THE WITNESS: Okay. 18 MR. PONTRELLI: You'll have 30 days but 19 because you're in prison, they will give you a few 20 extra, so -- 21 THE WITNESS: Okay. 22 MR. PONTRELLI: I don't know. What I'll 23 do is as soon as -- 24 THE WITNESS: Will I have to get my copy 25 or will there be one that I can --</p>

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<p style="text-align: right;">Page 130</p> <p>1 CONTRACTOR DISCLOSURE</p> <p>2 Pursuant to Article 10.B of the Rules and</p> <p>3 Regulations of the Board of Court Reporting of the</p> <p>4 Judicial Council of Georgia, I make the following</p> <p>5 disclosure:</p> <p>6 VERITEXT LEGAL SOLUTIONS is not disqualified</p> <p>7 for a relationship of interest under the provisions</p> <p>8 of O.C.G.A. 9-11-28(c).</p> <p>9 VERITEXT LEGAL SOLUTIONS was contacted by the</p> <p>10 offices of DEPARTMENT OF LAW, STATE OF GEORGIA to</p> <p>11 provide court reporting services for this deposition.</p> <p>12 VERITEXT LEGAL SOLUTIONS will not be taking</p> <p>13 this deposition under any contract that was</p> <p>14 prohibited by O.C.G.A. 15-14-27(a) and (b).</p> <p>15 VERITEXT LEGAL SOLUTIONS has no exclusive</p> <p>16 contract to provide reporting services with any party</p> <p>17 to the case, any counsel in the case or any reporter</p> <p>18 or reporting agency from whom a referral might have</p> <p>19 been made to cover the deposition.</p> <p>20 VERITEXT LEGAL SOLUTIONS will charge its</p> <p>21 usual and customary rate to all parties in the case,</p> <p>22 and a financial discount will not be given to any</p> <p>23 party to this litigation except in circumstances as</p> <p>24 agreed on a case by case basis.</p> <p>25</p> <p style="text-align: right;">Page 131</p> <p>1 TO: Cager A. Maleeah</p> <p>2 Re: Reading and Signing Your Deposition Transcript</p> <p>3 Date Errata due back at our offices: 06/24/2019</p> <p>4</p> <p>5 Greetings:</p> <p>6 You have reserved the right to read and sign your</p> <p>7 deposition transcript. Please review the attached</p> <p>8 PDF transcript, noting any changes or corrections</p> <p>9 on the attached PDF Errata. You may fill out the</p> <p>10 Errata electronically or print and fill out manually.</p> <p>11</p> <p>12 The PDF files open with Adobe Reader. If you need help</p> <p>13 opening these files, please see the instructions in the</p> <p>14 cover letter of this email.</p> <p>15</p> <p>16 Once you have completed your Errata, please print it, sign</p> <p>17 it, and have the document notarized in the place provided.</p> <p>18</p> <p>19 When the signed Errata is returned to us, we will seal</p> <p>20 and forward to the taking attorney to file with the</p> <p>21 original transcript. We will also send copies of the</p> <p>22 Errata to all ordering parties.</p> <p>23</p> <p>24 If the signed Errata is not returned within the time</p> <p>25 below, the original transcript may be filed with the</p> <p>26 court without your signature.</p> <p>27</p> <p>28 Please send completed Errata to:</p> <p>29 Veritext Production Facility</p> <p>30 20 Mansell Court</p> <p>31 Suite 300</p> <p>32 Roswell, GA 30076</p> <p>33 (770) 343-9696</p>	<p style="text-align: right;">Page 132</p> <p>1 ERRATA</p> <p>2 I, the undersigned, do hereby certify that I have read the</p> <p>3 transcript of my testimony, and that</p> <p>4</p> <p>5 ___ There are no changes noted.</p> <p>6 ___ The following changes are noted:</p> <p>7</p> <p>8 Pursuant to Rule 30(7)(e) of the Federal Rules of Civil</p> <p>9 Procedure and/or OCGA 9-11-30(e), any changes in form or</p> <p>10 substance which you desire to make to your testimony shall</p> <p>11 be entered upon the deposition with a statement of the</p> <p>12 reasons given for making them. To assist you in making any</p> <p>13 such corrections, please use the form below. If additional</p> <p>14 pages are necessary, please furnish same and attach.</p> <p>15</p> <p>16 Page ___ Line ___ Change _____</p> <p>17</p> <p>18 Reason for change _____</p> <p>19 Page ___ Line ___ Change _____</p> <p>20</p> <p>21 Reason for change _____</p> <p>22 Page ___ Line ___ Change _____</p> <p>23</p> <p>24 Reason for change _____</p> <p>25</p> <p>26 Page ___ Line ___ Change _____</p> <p>27</p> <p>28 Reason for change _____</p> <p>29</p> <p>30 Page ___ Line ___ Change _____</p> <p>31</p> <p>32 Reason for change _____</p> <p>33</p> <p>34 Page ___ Line ___ Change _____</p> <p>35</p> <p>36 Reason for change _____</p> <p>37</p> <p>38 Page ___ Line ___ Change _____</p> <p>39</p> <p>40 Reason for change _____</p> <p>41</p> <p>42 Page ___ Line ___ Change _____</p> <p>43</p> <p>44 Reason for change _____</p> <p>45</p> <p>46 Page ___ Line ___ Change _____</p> <p>47</p> <p>48 Reason for change _____</p> <p>49</p> <p>50 Page ___ Line ___ Change _____</p> <p>51</p> <p>52 Reason for change 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<p>135</p> <p>136 Reason for change _____</p> <p>137</p> <p>138 Page ___ Line ___ Change _____</p> <p>139</p> <p>140 Reason for change _____</p> <p>141</p> <p>142 Page ___ Line ___ Change _____</p> <p>143</p> <p>144 Reason for change _____</p> <p>145</p> <p>146 Page ___ Line ___ Change _____</p> <p>147</p> <p>148 Reason for change _____</p> <p>149</p> <p>150 Page ___ Line ___ Change _____</p> <p>151</p> <p>152 Reason for change _____</p> <p>153</p> <p>154 Page ___ Line ___ Change _____</p> <p>155</p> <p>156 Reason for change _____</p> <p>157</p> <p>158 Page ___ Line ___ Change _____</p> <p>159</p> <p>160 Reason for change _____</p> <p>161</p> <p>162 Page ___ Line ___ Change _____</p> <p>163</p> <p>164 Reason for change _____</p> <p>165</p> <p>166 Page ___ Line ___ Change _____</p> <p>167</p> <p>168 Reason for change _____</p> <p>169</p> <p>170 Page ___ Line ___ Change _____</p> <p>171</p> <p>172 Reason for change _____</p> <p>173</p> <p>174 Page ___ Line ___ Change _____</p> <p>175</p> <p>176 Reason for change _____</p> <p>177</p> <p>178 Page ___ Line ___ Change _____</p> <p>179</p> <p>180 Reason for change _____</p> <p>181</p> <p>182 Page ___ Line ___ Change _____</p> <p>183</p> <p>184 Reason for change _____</p> <p>185</p> <p>186 Page ___ Line ___ Change _____</p> <p>187</p> <p>188 Reason for change _____</p> <p>189</p> <p>190 Page ___ Line ___ Change _____</p> <p>191</p> <p>192 Reason for change _____</p> <p>193</p> <p>194 Page ___ Line ___ Change _____</p> <p>195</p> <p>196 Reason for change _____</p> <p>197</p> <p>198 Page ___ Line ___ Change _____</p> <p>199</p> <p>200 Reason for change _____</p> <p>201</p> <p>202 Page ___ Line ___ Change _____</p> <p>203</p> <p>204 Reason for change _____</p> <p>205</p> <p>206 Page ___ Line ___ Change _____</p> <p>207</p> <p>208 Reason for change _____</p> <p>209</p> <p>210 Page ___ Line ___ Change _____</p> <p>211</p> <p>212 Reason for change _____</p> <p>213</p> <p>214 Page ___ Line ___ Change _____</p> <p>215</p> <p>216 Reason for change _____</p> <p>217</p> <p>218 Page ___ Line ___ Change _____</p> <p>219</p> <p>220 Reason for change _____</p> <p>221</p> <p>222 Page ___ Line ___ Change _____</p> <p>223</p> <p>224 Reason for change _____</p> <p>225</p> <p>226 Page ___ Line ___ Change _____</p> <p>227</p> <p>228 Reason for change _____</p> <p>229</p> <p>230 Page ___ Line ___ Change _____</p> <p>231</p> <p>232 Reason for change _____</p> <p>233</p> <p>234 Page ___ Line ___ Change _____</p> <p>235</p> <p>236 Reason for change _____</p> <p>237</p> <p>238 Page ___ Line ___ Change _____</p> <p>239</p> <p>240 Reason for change _____</p> <p>241</p> <p>242 Page ___ Line ___ Change _____</p> <p>243</p> <p>244 Reason for change _____</p> <p>245</p> <p>246 Page ___ Line ___ Change _____</p> <p>247</p> <p>248 Reason for change _____</p> <p>249</p> <p>250 Page ___ Line ___ Change _____</p> <p>251</p> <p>252 Reason for change _____</p> <p>253</p> <p>254 Page ___ Line ___ Change _____</p> <p>255</p> <p>256 Reason for 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<p>337</p> <p>338 Page ___ Line ___ Change _____</p> <p>339</p> <p>340 Reason for change _____</p> <p>341</p> <p>342 Page ___ Line ___ Change _____</p> <p>343</p> <p>344 Reason for change _____</p> <p>345</p> <p>346 Page ___ Line ___ Change _____</p> <p>347</p> <p>348 Reason for change _____</p> <p>349</p> <p>350 Page ___ Line ___ Change _____</p> <p>351</p> <p>352 Reason for change _____</p> <p>353</p> <p>354 Page ___ Line ___ Change _____</p> <p>355</p> <p>356 Reason for change _____</p> <p>357</p> <p>358 Page ___ Line ___ Change _____</p> <p>359</p> <p>360 Reason for change _____</p> <p>361</p> <p>362 Page ___ Line ___ Change _____</p> <p>363</p> <p>364 Reason for change _____</p> <p>365</p> <p>366 Page ___ Line ___ Change _____</p> <p>367</p> <p>368 Reason for change _____</p> <p>369</p> <p>370 Page ___ Line ___ Change _____</p> <p>371</p> <p>372 Reason for change _____</p> <p>373</p> <p>374 Page ___ Line ___ Change _____</p> <p>375</p> <p>376 Reason for change _____</p> <p>377</p> <p>378 Page ___ Line ___ Change _____</p> <p>379</p> <p>380 Reason for change _____</p> <p>381</p> <p>382 Page ___ Line ___ Change _____</p> <p>383</p> <p>384 Reason for change _____</p> <p>385</p> <p>386 Page ___ Line ___ Change _____</p> <p>387</p> <p>388 Reason for change _____</p> <p>389</p> <p>390 Page ___ Line ___ Change _____</p> <p>391</p> <p>392 Reason for change _____</p> <p>393</p> <p>394 Page ___ Line ___ Change _____</p> <p>395</p> <p>396 Reason for change _____</p> <p>397</p> <p>398 Page ___ Line ___ Change _____</p> <p>399</p> <p>400 Reason for change _____</p> <p>401</p> <p>402 Page ___ Line ___ Change _____</p> <p>403</p> <p>404 Reason for change _____</p> <p>405</p> <p>406 Page ___ Line ___ Change _____</p> <p>407</p> <p>408 Reason for change _____</p> <p>409</p> <p>410 Page ___ Line ___ Change _____</p> <p>411</p> <p>412 Reason for change _____</p> <p>413</p> <p>414 Page ___ Line ___ Change _____</p> <p>415</p> <p>416 Reason for change _____</p> <p>417</p> <p>418 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<p>579</p> <p>580 Reason for change _____</p> <p>581</p> <p>582 Page ___ Line ___ Change _____</p> <p>583</p> <p>584 Reason for change _____</p> <p>585</p> <p>586 Page ___ Line ___ Change _____</p> <p>587</p> <p>588 Reason for change _____</p> <p>589</p> <p>590 Page ___ Line ___ Change _____</p> <p>591</p> <p>592 Reason for change _____</p> <p>593</p> <p>594 Page ___ Line ___ Change _____</p> <p>595</p> <p>596 Reason for change _____</p> <p>597</p> <p>598 Page ___ Line ___ Change _____</p> <p>599</p> <p>600 Reason for change _____</p> <p>601</p> <p>602 Page ___ Line ___ Change _____</p> <p>603</p> <p>604 Reason for change _____</p> <p>605</p> <p>606 Page ___ Line ___ Change _____</p> <p>607</p> <p>608 Reason for change _____</p> <p>609</p> <p>610 Page ___ Line ___ Change _____</p> <p>611</p> <p>612 Reason for change _____</p> <p>613</p> <p>614 Page ___ Line ___ Change _____</p> <p>615</p> <p>616 Reason for change _____</p> <p>617</p> <p>618 Page ___ Line ___ Change _____</p> <p>619</p> <p>620 Reason for change _____</p> <p>621</p> <p>622 Page ___ Line ___ Change _____</p> <p>623</p> <p>624 Reason for change _____</p> <p>625</p> <p>626 Page ___ Line ___ Change _____</p> <p>627</p> <p>628 Reason for change _____</p> <p>629</p> <p>630 Page ___ Line ___ Change _____</p> <p>631</p> <p>632 Reason for change _____</p> <p>633</p> <p>634 Page ___ Line ___ Change _____</p> <p>635</p> <p>636 Reason for change _____</p> <p>637</p> <p>638 Page ___ Line ___ Change _____</p> <p>639</p> <p>640 Reason for change _____</p> <p>641</p> <p>642 Page ___ Line ___ Change _____</p> <p>643</p> <p>644 Reason for change _____</p> <p>645</p> <p>646 Page ___ Line ___ Change _____</p> <p>647</p> <p>648 Reason for change _____</p> <p>649</p> <p>650 Page ___ Line ___ Change _____</p> <p>651</p> <p>652 Reason for change _____</p> <p>653</p> <p>654 Page ___ Line ___ Change _____</p> <p>655</p> <p>656 Reason for change _____</p> <p>657</p> <p>658 Page ___ Line ___ Change _____</p> <p>659</p> <p>660 Reason for change _____</p> <p>661</p> <p>662 Page ___ Line ___ Change _____</p> <p>663</p> <p>664 Reason for change _____</p> <p>665</p> <p>666 Page ___ Line ___ Change _____</p> <p>667</p> <p>668 Reason for change _____</p> <p>669</p> <p>670 Page ___ Line ___ Change _____</p> <p>671</p> <p>672 Reason for change _____</p> <p>673</p> <p>674 Page ___ Line ___ Change _____</p> <p>675</p> <p>676 Reason for change _____</p> <p>677</p> <p>678 Page ___ Line ___ Change _____</p> <p>679</p> <p>680 Reason for change _____</p> <p>681</p> <p>682 Page ___ Line ___ Change _____</p> <p>683</p> <p>684 Reason for change _____</p> <p>685</p> <p>686 Page ___ Line ___ Change _____</p> <p>687</p> <p>688 Reason for change _____</p> <p>689</p> <p>690 Page ___ Line ___ Change _____</p> <p>691</p> <p>692 Reason for change _____</p> <p>693</p> <p>694 Page ___ Line ___ Change _____</p> <p>695</p> <p>696 Reason for change _____</p> <p>697</p> <p>698 Page ___ Line ___ Change _____</p> <p>699</p> <p>700 Reason for 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<p>781</p> <p>782 Page ___ Line ___ Change _____</p> <p>783</p> <p>784 Reason for change _____</p> <p>785</p> <p>786 Page ___ Line ___ Change _____</p> <p>787</p> <p>788 Reason for change _____</p> <p>789</p> <p>790 Page ___ Line ___ Change _____</p> <p>791</p> <p>792 Reason for change _____</p> <p>793</p> <p>794 Page ___ Line ___ Change _____</p> <p>795</p> <p>796 Reason for change _____</p> <p>797</p> <p>798 Page ___ Line ___ Change _____</p> <p>799</p> <p>800 Reason for change _____</p> <p>801</p> <p>802 Page ___ Line ___ Change _____</p> <p>803</p> <p>804 Reason for change _____</p> <p>805</p> <p>806 Page ___ Line ___ Change _____</p> <p>807</p> <p>808 Reason for change _____</p> <p>809</p> <p>810 Page ___ Line ___ Change _____</p> <p>811</p> <p>812 Reason for change _____</p> <p>813</p> <p>814 Page ___ Line ___ Change _____</p> <p>815</p> <p>816 Reason for change _____</p> <p>817</p> <p>818 Page ___ Line ___ Change _____</p> <p>819</p> <p>820 Reason for change _____</p> <p>821</p> 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Georgia Code

Title 9, Chapter 11

Article 5, Section 9-11-30

(e) Review by witness; changes; signing.

If requested by the deponent or a party before completion of the deposition, the deponent shall have 30 days after being notified by the officer that the transcript or recording is available in which to review the transcript or recording and, if there are changes in form or substance, to sign a statement reciting such changes and the reasons given by the deponent for making them. The officer shall indicate in the certificate prescribed by paragraph (1) of subsection (f) of this Code section whether any review was requested and, if so, shall append any changes made by the deponent during the period allowed. If the deposition is not reviewed and signed by the witness within 30 days of its submission to him or her, the officer shall sign it and state on the record that the deposition was not reviewed and signed by the deponent within 30 days. The deposition may then be used as fully as though signed unless, on a motion to suppress under paragraph (4) of subsection (d) of Code

Section 9-11-32, the court holds that the reasons given for the refusal to sign require rejection of the deposition in whole or in part.

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE STATE RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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